

DISTRIBUTION SYSTEM CODE TASK FORCE

CHAPTER 1

**SUMMARIES OF RECOMMENDATIONS:
OBLIGATIONS TO PROVIDE INFORMATION**

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1.1 PURPOSE OF GENERIC TEMPLATE FOR CONDITIONS OF SERVICE DOCUMENT

[FINALIZED: SEPTEMBER 15, 1999]

Issue Statement

Instead of listing detailed requirements in the Distribution System Code (DSC), distributors may be required to create their own Conditions of Service. The Conditions of Service would include details with respect to connection, payment, termination, voltages offered by a distributor, and other particulars related to the distribution service offered by the distributor.

In order to facilitate the creation of a documented Conditions of Service by each distributor, the Board could provide a generic template or sample that would be deemed to be adopted by each distributor who did not create their own. The issue is:

What should be the purpose of the generic template for Conditions of Service?

Options

1. To set the minimum requirements for a distributor's Conditions of Service.
2. To serve as a template that any distributor could use to create their own Conditions of Service document.
3. To serve as a template that all distributors must use as the basis for their Conditions of Service.

Background Information

Some distributors currently do not have a document Conditions of Service. Although most distributors have set their own means of doing business and abide by the guidelines the Municipal Electric Authority (MEA) has issued, a requirement that all distributors have a documented Conditions of Service may create difficulty for those distributors that have not documented their practices. In addition, existing guidelines may not be practical or feasible under the new combination of license conditions, codes and rates that will be set by the OEB.

For these distributors, a generic Conditions of Service document may be useful. However, it is important to delineate the purpose of this document and the format that it should take.

Implementation Issues

A generic Conditions of Service may create minimum conditions that distributors are unable to

meet. However, it is unclear whether the OEB is able to issue a new document that would in effect replace the general guidelines in the DSC. If a detailed set of minimum requirements is to be defined, it is unclear that this should occur in the generic Conditions of Service document instead of the DSC.

Summary of Discussion

If the DSC is to provide general guidelines for distributors, a Conditions of Service document may be warranted in order to detail the specific operating practices of distributors that comply with the guidelines in the DSC. Thus, the purpose of the Conditions of Service is to allow distributors to set their own standards and practices with respect to the operation and maintenance of their distribution systems and to establish a record.

Since some distributors do not have their own Conditions of Service already delineated, it was suggested that the OEB could issue a generic Conditions of Service. This document would serve as the minimum requirements that a distributor must meet.

The difficulty of setting minimum conditions in a generic Conditions of Service is that it defeats the purpose of allowing each distributor to pursue their own practices that best meet the specifics of their distribution system. If the goal of the DSC is to provide guidelines, a generic Conditions of Service that sets minimum standards requires a detailed delineation of what is required by distributors. These requirements are better placed in the DSC itself, as opposed to a second document that has no legislative authority.

Since most distribution companies already have their own operating practices, a generic Conditions of Service could be used to assist them in documenting their practices. This could be done quite easily. For example, the OEB could post on its website an interactive generic Conditions of Service. A distributor would be asked questions about certain aspects of their practice such as:

How is a connection defined? (100 metres of feeder line, less than three power poles, etc.)

What voltages are offered?

These questions could be posed in the form of a multiple choice, with a blank included where a distributor could describe its practice. The answers then automatically could be incorporated into a generic template. The distributor then would have a starting point for its documented Conditions of Service.

If all distributors follow the generic template, comparisons between distribution service territories would be facilitated. A consistent format would assist distribution system users, developers and retailers in comparing distribution services that are offered in each distribution service territory.

Similarly, the OEB would be able to review each distributor's Conditions of Service document and be able to compare service conditions offered by each distributor. This would allow the OEB to better determine whether each distributor was in compliance with the DSC.

In order to achieve these benefits, however, the generic template would have to have a logical numbering system that is incorporated into each distributor's Condition of Supply document (e.g., section one would be the same for each distributor) and all distributors would be required to follow the numbering and format of the generic template for Conditions of Service. The last section of the template may be reserved for "Other Conditions," in which unique conditions of each distribution system that are not otherwise captured in the document would be listed.

Some distributors already may have their own detailed Conditions of Service document. These distributors may not wish to incur the additional expense of developing a separate document that is in the format of the generic template. In addition, these distributors may prefer to maintain two sets of documents and use their own version for customer communications. One way to address the potential duplication of effort may be to allow these distributors to continue using their own document and simply cross-reference the table of contents of the generic format. However, this approach may not be useful for retailers or developers who would prefer a standard format across the province. Furthermore, the cross-reference may not be of much use if there were multiple cross-references. Some argued that given today's word processing programs and computer technology, it would not entail much effort for a distributor to rearrange its existing document into the new format, should the generic template be required.

It is important to establish a vehicle for imposing the generic Conditions of Service requirement on distributors. The DSC could list the general service terms that must be described in each distributor's Conditions of Service. A copy of the generic template could be attached to the DSC as an appendix. This approach would incorporate the generic template into the DSC as part of the DSC, thereby lending it the backing of legislative authority.

Recommendation

We recommend Option 3. The DSC should establish a generic template for the Conditions of Service and create an approach to assist distributors in establishing their own Conditions of Service document. Each distributor should be required to follow the format of the template. The generic template should be included in the DSC as an appendix.

Voter Summary

One dissenting opinion.

Dissenting Opinions

It was suggested that Option 3 be modified so that the generic template would be required only if a distributor did not already have a Conditions of Service document. If a distributor already had its own Conditions of Service document, the distributor would be required to ensure that all of the information required by the generic template was in its own document. These distributors also would be required to include a page in their Conditions of Service document that cross-referenced the table of contents of their documents with the table of contents in the generic Conditions of Service document.

1.2 GENERIC CONDITIONS OF SERVICE DOCUMENT

**[BASED ON TEMPLATE FINALIZED: APRIL 10, 2000
AND
FULL DOCUMENT FINALIZED: MARCH 10, 2000]**

The Distribution System Code (DSC) requires that every distributor produce its own “Conditions of Service” document. The purpose of this document is to provide a means of communicating the types and level of service available to the Customers within the distributors service territory. The DSC requires that the Conditions of Service be readily available for review by the general public. In addition, the most recent version of the document must be provided to the Ontario Energy Board (OEB) who in turn will retain it on file for the purpose of facilitating dispute resolutions in the event that a dispute cannot be resolved locally.

This template has been prepared to assist distributors in developing their own “Conditions of Service” document based on current practice and the Distribution System Code. The template outlines the minimum requirements; however, distributors are encouraged to expand on the content to encompass local constraints and other specific requirements. The form and layout of the Condition of Service document are as required by the OEB. However, if a distributor chooses a different format then the distributor must provide a cross-reference to this layout.

The template will also serve as a reference for distributors who may require changes to their existing documents in order to reflect new changes prescribed by the governing Legislation, Licenses, and Codes.

The General section contains references to services and requirements, which span across all Customer classes. This section should cover such items as Rates, Billing, Hours of Work, Emergency Response, Power Quality, Available Voltage etc.

The Customer Specific section contains references to services and requirements, which are specific to individual Customer classes. This section would cover such items as Metering, Service Entrance Requirements, Delineation of Ownership, Special Contracts, etc.

The Appendices should include Connection Agreements, etc. along with any other documentation, which may not easily be incorporated into specific sections.

EXPLANATORY NOTE: The attached document contains general discussion about what should be included in each section as well as examples to illustrate potential content. Examples are illustrative only and are indicated by *italics*. These should not serve as a guideline or indication of the content that must be in the Conditions of Service document, but are presented for illustrative purposes only.

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SECTION 1 INTRODUCTION

1.1 Identification of Distributor and Territory

In this section the distributor should identify their service territory as defined in the Distribution Licence.

For example:

{THE DISTRIBUTOR - FULL CORPORATE NAME} referred to herein as the Distributor is a corporation, incorporated under the laws of the Province of Ontario to distribute electricity.

The Distributor is licensed by the Ontario Energy Board “OEB” to supply electricity to Customers as described in the Transitional Distribution License and thereafter by the Distribution License issued to the Distributor on [DATE] by the OEB. Additionally there are requirements imposed on the Distributor by the various codes referred to in the License and by the Electricity Act and the Ontario Energy Board Act.

The Distributor is limited to operate distribution facilities within their Licensed Territory as defined in the Distribution License. The defined Territory is

Nothing contained in this document or in any contract for the supply of electricity by the Distributor shall prejudice or affect any rights, privileges, or powers vested in the Distributor by law under any Act of the Legislature of Ontario or the Parliament of Canada, or any regulations thereunder.

The Distributor will normally provide one electrical service to each customer’s location at a nominal service voltage.

Electrical energy purchased from the Distributor may not be resold at a profit by any customer to a third party using the distributor’s rates. In the case of multi-tenant buildings with bulk meeting, the Owner must pay the total cost of electrical energy.

The customer or their authorized representative must make application for new or upgraded electric services and temporary power services in person.

The customer or their representative shall consult with the Distributor concerning the availability of supply, the voltage of supply, service location, metering and any other details. These requirements are separate from and in addition to those of the Electrical Inspection Authority. The Distributor will confirm, in writing, the Characteristics of Electric Supply available at a specific site.

The customer is required to provide the Distributor sufficient lead-time in order to ensure: (a) the timely provision of supply to new and upgraded premises or (b) the availability of adequate capacity for additional loads to be connected in existing premises.

If special equipment is required or equipment delivery problems occur then longer lead times may be necessary. The customer will be notified of any extended lead times.

Customers will be required to pay the cost of repair or replacement of the Distributor's equipment that has been damaged through the customer's action or neglect.

The supply of electricity is conditional upon the Distributor being permitted and able to provide such a supply, obtaining the necessary apparatus and material, and constructing works to provide the service. Should the Distributor not be permitted to supply or not be able to do so, it is under no responsibility to the customer whatsoever.

Prior to commencing any service work, the customer must consult with the Distributor to ensure compliance with current requirements.

Customers may be required to pay Capital Contributions for the addition of new electrical services in accordance to calculations on overall system cost impact.

1.2 Related Codes and Governing Laws

In this section make reference to any legislation that is applicable to the distributor – customer relationship.

For example:

The Distributor is limited in its scope of operation by the:

- 1. Ontario Energy Board Act, 1998*
- 2. Distribution Licence*
- 3. Affiliate Relationships Code*
- 4. Distribution System Code*
- 5. Retail Settlements Code*
- 6. Standard Service Supply Code*

In the event of a conflict between this document and the Distribution Licence or regulatory Codes issued by the OEB, or the Electricity Act, the provisions of the Act, the Distribution License and associated regulatory Codes shall prevail.

When planning and designing for electricity service, Customers and their agents must refer to all

applicable provincial and Canadian electrical codes, and all other applicable federal, provincial, and municipal laws, regulations, codes and by-laws to also ensure compliance with their requirements. The work shall be conducted in accordance with the Ontario Occupational Health and Safety Act, the Regulations for Construction Projects and the E&USA (or the OHSC Safety) rulebook.

1.3 Interpretations

In this section outline the rules for interpretation of this document.

For example:

In these Conditions, unless the context otherwise requires:

- *Headings and underlining are for convenience only and do not affect the interpretation of these Rules.*
- *Words referring to the singular include the plural and vice versa.*
- *Words referring to a gender include any gender.*

1.4 Amendments and Changes

In this section outline the process for making changes to this document. Include any public notice provisions.

For example:

The provisions of these Conditions of Service and any amendments made from time to time form part of any Contract made between the Distributor and any connected Customer, Generator or their agents.

In the event of changes to this Conditions of Service, a Public notice shall be made in the form of either a notice in the local newspaper, or a notice on the Distributor's Website.

The Customer is responsible for contacting the Distributor to ensure that the Customer has, or to obtain the current version of the Conditions of Service. The Distributor may charge a reasonable fee for providing the Customer with a copy of this document.

1.5 Contact Information

In this section provide information on how a customer can contact the distributor. Include such

items as: address of the distributor, telephone numbers, normal business hours, emergency contact numbers.

For example:

The Distributor and its agents can be contacted during normal working hours (Monday to Friday between 8:30 and 4:30) at XXX-XXX-XXXX. In the event of an emergency, outside of normal working hours, the Distributor or its agents can be contacted by phone at XXX-XXX-XXXX. If a distributor has contact numbers specific to different circumstances they should be listed in this section.

1.6 Customer Rights

In this section the rights and obligations a customer or embedded generator has with respect to the distributor and not covered elsewhere in this document should be outlined.

1.7 Distributor Rights

In this section the rights a distributor has with respect to a customer or embedded generator and not covered elsewhere in this document should be outlined.

1.8 Disputes

Any dispute between Customers or Retailers and the Distributor shall be settled according to the dispute resolution process specified in Section 23 of the Transitional Distribution Licence.

In this section, the Distributor should outline the Customer Complaint and Dispute Resolution processes they have establish as required by their Distribution License.

For example:

Any dispute between Customers or Retailers and the Distributor shall be settled according to the dispute resolution process specified in Section 23 of the Transitional Distribution Licence or, once permanent licences are issued, by the relevant section of the permanent licence. Section 23 of the Transitional Distribution Licence states that the Licensee shall:

- a) *establish proper administrative procedures for resolving complaints by consumers and other market participants' complaints regarding services provided under the terms of this Licence;*
- b) *publish information which will facilitate its Customers accessing its complaints resolution process;*

- c) *refer unresolved complaints and subscribe to an independent third party complaints resolution agency which has been approved by the Board;*
- d) *make a copy of the complaints resolution procedure available for inspection by members of the public at each of the Licensee's premises during normal business hours;*
- e) *give or send free of charge a copy of the procedure to any person who reasonably requests it; and keep a record of all complaints whether resolved or not including the name of the complainant, the nature of the complaint, the date resolved or referred and the result of the dispute resolution.*

SECTION 2 DISTRIBUTION ACTIVITIES (GENERAL)

2.1 Connections

This section should include information that is applicable to all customer classes of the distributor. Items that are applicable to only a specific customer class are covered in Section 3.

2.1.1 Building that Lies Along

As provided in Section 28 of the Electricity Act 1998 , the Distributor has the Obligation to Connect any Building that “lies along” its distribution system. A building “lies along” a distribution line if it can be connected to the distributor’s distribution system without an expansion or enhancement, and meets the conditions listed in the Conditions of Service of the distributor who owns or operates the distribution line.

For example:

A Building that “lies along” a distribution line may be refused connection to that line should the distribution line not have sufficient capacity for the requested connection.

A Building that “lies along” a distribution line may be refused connection to that line should the connection be bad or unsafe for the system.

The criteria for establishing an unsafe connection or a connection, which adversely affects the system, should be further documented within the Conditions of Service.

The Distributor may also stipulate that a customer requesting a Connection abide by the terms and conditions further stipulated within the Conditions of Service.

2.1.2 Expansions / Offer to Connect

Under the terms of the Distribution System Code a Distributor has the Obligation to make an Offer to Connect any Building that “lies along” its distribution system yet may be excluded due to being outside of the Service Territory, or falls outside of the criteria outlined above. The Offer to connect must be Fair and Reasonable and be based on the distributor’s design standard. The Offer to Connect must also be made within a reasonable time from the request for connection.

The Distributor shall outline, in detail, the process followed to determine any required capital contributions.

The Distributor shall outline their fixed connection fees as well as their variable connection fees by customer class.

2.1.3 Connection Denial

This section should describe the reasons for which a distributor may deny connection.

For example:

The Distribution System Code sets out the conditions for a Distributor to deny connections. A Distributor is not obligated to connect a building within its service territory if the connection would result in any of the following:

- *Contravention of existing laws of Canada and the Province of Ontario.*
- *Violations of conditions in a Distributor’s Licence.*
- *Use of a distribution system line for a purpose that it does not serve and that the Distributor does not intend to serve.*
- *Adverse effect on the reliability and safety of the distribution system.*
- *Imposition of an unsafe work situation beyond normal risks inherent in the operation of the distribution system.*
- *A material decrease in the efficiency of the distributor’s distribution system.*
- *A material adverse effect on the quality of distribution services received by an existing connection.*
- *Discriminatory access to distribution services.*
- *Potential increases in monetary amounts that already are in arrears with the distributor*
- *Any other conditions documented in the distributors Conditions of Service document that are consistent with the conditions identified above and with the goals delineated in the Energy Competition Act, 1998.*

If a Distributor refuses to connect a building in its service territory that lies along one of its distribution lines, the distributor must inform the person requesting the connection of the reasons for not connecting, and where the distributor is able to provide a remedy, make an offer to connect. If the Distributor is unable to provide a remedy to resolve the issue, it is the responsibility of the customer to do so before a connection can be made.

2.1.4 Inspections Before Connections

In this section the Distributor should specify what their requirements are with respect to inspection of civil work installed by a contractor. The Distributor may wish to state the requirement for inspection by the Electrical Safety Authority prior to the commencement of electricity supply.

For example:

All Customer electrical installations shall be inspected and approved by the Electrical Safety Authority and must also meet the Distributor's requirements. The Distributor requires notification from the Electrical Safety Authority of this approval prior to the energization of a Customer's supply of electricity. Services that have been disconnected for a period of six months or longer must also be re-inspected and approved by the Electrical Safety Authority prior to reconnection.

Temporary services, typically used for construction purposes, must be approved by the Electrical Safety Authority for a period of twelve months and must be reinspected should the period of use exceed twelve months.

Customer owned substations must be inspected by both the Electrical Safety Authority and the Distributor.

Duct banks shall be inspected and approved by the Distributor prior to the pouring of concrete and again before backfilling. The completed ducts must be rodded by the site contractor in the presence of a Distributor inspector and shall be clear of all extraneous material. A mandrel, to nominal diameter of duct, supplied by the Distributor, will be passed through each duct. In the event of ducts blocked by ice, the owner's representative will be responsible for clearing the ducts prior to the cable installation. Connection to existing concrete duct banks or manholes will be done only by an approved contractor. All work done on existing Distributor must be authorized by the Distributor and carried out in accordance with all applicable safety acts and regulations.

Transformer rooms shall be inspected and approved by the Distributor prior to the installation of equipment.

Provision for metering shall be inspected and approved by the Distributor prior to energization.

2.1.5 Relocation of Plant

In this section, the Distributor should specify what their policy is with respect to relocation of plant as a result of a Customer's request. If the Customer is or may be required to pay for the relocation this should be specified here.

2.1.6 Easements

In this section, the Distributor should put any requirements for easements.

For example;

The Customer shall grant, at no cost to the Distributor, where required, an easement to permit installation and maintenance of service. The width and extent of this easement shall be determined by the Distributor. The easement shall be granted prior to energization of the service.

To maintain the reliability, integrity and efficiency of the distribution system, the Distributor has the right to have supply facilities on private property registered against title to the property. Easements are required whenever the Distributor's underground or overhead plant is to be located on private property or crosses over an adjacent private property to service a Customer other than the owner of that adjacent property.

The Customer will prepare at its own costs a reference plan and associated easement documents to the satisfaction of the Distributor's solicitor prior to its registration and register the easement plan. Details will be provided upon application for service.

2.1.7 Contracts

In this section, the Distributor should outline the types of contracts that are available for each type of Customers, including standard, implied and special contracts.

For example:

***Standard Form of Contract** - Connection to the electrical distribution system will be provided upon completion of a signed contract between the customer and the distributor and receipt of approval by the Electrical Safety Authority.*

All customers will be required to complete and sign the standard form of contract to apply for the supply of an electrical energy connection. A Standard Contract for service shall be

considered as being in force from the date it is signed by the Customer and the Distributor and shall remain in force until terminated by either party.

Implied Contract - *In all cases, notwithstanding the absence of a formal contract, the taking and using of electrical energy from the Distributor by any Person or Persons constitutes the acceptance of the terms and conditions of all regulations, conditions and rates as established by the Distributor. Such acceptance and use of energy shall be deemed to be the acceptance of a binding contract with the Distributor and the Person so accepting shall be liable for payment for such energy and the contract shall be binding upon the Person's heirs, administrators, executors, successors or assigns.*

Special Contracts - *Special contracts that are customized in accordance with the service requested by the Customer normally include, but are not necessarily limited to, the following examples:*

- *construction sites*
- *mobile facilities*
- *non-permanent structures*
- *special occasions, etc.*
- *generation*

2.2 Disconnection

In this section the Distributor should specify under what circumstances it has the right or obligation to disconnect a Customer.

For example:

The Distributor has the right and/or obligation to disconnect the supply of electrical energy to a Customer for causes not limited to:

- *Overdue amounts payable to the Distributor, Retailer or Wholesaler (provided the Distributor provides the Customer with reasonable notice of the proposed shut off of electricity).*
- *Hazardous conditions.*
- *Electrical disturbance propagation caused by Customer equipment that is not corrected in a timely fashion.*
- *Energy diversion, fraud or abuse on the part of the Customer.*

2.3 Conveyance of Electricity

2.3.1 Guaranty of Supply

In this section the Distributor should specify their limitations on the guaranty of supply. The Distributor should also make reference to the Electricity Act Section 40 provisions for ‘Powers of Entry.’

For example:

The Distributor agrees to use reasonable diligence in providing a regular and uninterrupted supply but does not guarantee a constant supply or the maintenance of unvaried frequency or voltage and will not be liable in damages to the Customer by reason of any failure in respect thereof.

Customers requiring a higher degree of security than that of normal supply, are responsible to provide their own back-up or standby facilities.

The Distributor endeavour to maintain voltage variation limits, under normal operating conditions, at the Customers' Delivery Points, as specified by the latest edition of the Canadian Standards Association, C235.

Customers may require special protective equipment on their premises to minimize the effect of momentary power interruptions.

Customers requiring a three-phase supply should install protective apparatus to avoid damage to their equipment, which may be caused by the interruption of one phase, or non-simultaneous switching of phases of the Distributor's supply.

Although it is the Distributor's policy to minimize inconvenience to Customers, it is necessary to occasionally interrupt a Customer's supply to maintain or improve the Distributor's system, or to provide new or upgraded services to other Customers. Whenever practical and cost effective, as determined by the Distributor, arrangements suitable to the Customer and the Distributor will be made to minimize any inconvenience. The Distributor will endeavor to provide the Customer with reasonable advance notice, except in cases of extreme emergency, involving danger to life and limb, or impending severe equipment damage.

The Distributor will endeavor to notify Customers prior to interrupting the supply to any individual service. However, if an unsafe or hazardous condition is found to exist, or if the use of electricity by apparatus, appliances, or other equipment is found to be unsafe or damaging to the Distributor or the public, service may be discontinued without notice.

Depending on the outage duration and the number of Customers affected, the Distributor may issue a news release to advise the general public of the outage.

2.3.2 Power Quality

In this section the Distributor should outline the guidelines that the Distributor will endeavor to adhere to such as service voltage guidelines and outage notification process. The Distributor should also indicate the process for handling voltage disturbances and power quality testing and remedial action.

For example:

In response to a Customer power quality concern, where the utilization of electric power affects the performance of electrical equipment, the Distributor will perform investigative analysis to identify the underlying cause. Depending on the circumstances, this may include review of relevant power interruption data, trend analysis, and/or use of diagnostic measurement tools.

Upon determination of the cause resulting in the power quality concern, where it is deemed a system delivery issue and where industry standards are not met, the Distributor will recommend and/or take appropriate mitigation measures. The Distributor will endeavor to control harmonics generated by its own system where these are found to be detrimental to the Customers. If the Distributor is unable to correct the problem due to the impact on other Customers, then it is not obligated to make the corrections. The Distributor will use appropriate industry standards (such as IEC or IEEE standards) as a guideline. If the problem lies on the Customer side of the system, the Distributor may seek reimbursement for the time spent in investigating the problem.

If an undesirable system disturbance is being caused by Customer's equipment, the Customer will be required to cease operation of the equipment until satisfactory remedial action has been taken. If the Customer does not take such action within a reasonable time, the Distributor may disconnect the supply of power to the Customer.

2.3.3 Electrical Disturbances

In this section the Distributor should outline the guidelines that the Distributor and the customer will be expected to adhere to with regards to electrical disturbances.

For example:

There are levels of voltage fluctuation and other disturbances that can cause flickering lights and more serious difficulties for Customers connected to the Distributor distribution system.

Customers must ensure that their equipment does not cause any disturbances such as harmonics and spikes that might interfere with the operation of adjacent Customer equipment. Examples of equipment, that may cause disturbance include large motors, welders and variable speed drives. In planning the installation of such equipment, the Customer must consult with the Distributor.

Some types of electronic equipment, such as video display terminals, can be affected by the close proximity of high electrical currents that may be present in transformer rooms.

The Distributor will assist in attempting to resolve any such difficulties at the Customer's expense.

Customers who may require an uninterrupted source of power supply or a supply completely free from fluctuation and disturbance must provide their own power conditioning equipment for these purposes.

2.3.4 Standard Voltage Offerings

In this section, the Distributor should specify what voltages are available for each type of Customers based on their supply requirements. This should include both the primary and secondary voltages available. Additionally, should there be a physical or geographic constraint on a particular voltage, this should be detailed in this section.

For example:

[For Secondary Voltage offerings]

Depending on the type of distribution plant that "lies along", the preferred secondary voltage will be at 120/240 V, single phase, 120/208 V, or 600/347 V.

The Supply Voltage governs the limit of supply capacity for any Customer. General guidelines for supply from overhead street circuits are as follows:

- (i) at 120/240 V, single phase up to 75 kVA demand load, or*
- (ii) 600/347 V, three phase, four wire up to 80 kVA demand load, or*
- (iii) at both 120/240 V, single phase and 600/347 V, three phase, four wire up to 100 kVA sum total demand load, or*
- (iv) at 208 V, three phase or 208/120 V, three phase, four wire up to 100 kVA demand load,*

OR

Where street circuits are buried, the Supply Voltage and limits will be determined upon application to the Distributor.

OR

Where the Customer or Developer provides a pad on private property;

- (i) at 120/240 V, single phase, supply is available up to 167 kVA, or*
- (ii) at 208/120 V, three phase, four wire, supply is available for loads up to 500 kVA demand load, or*
- (iii) at 600/347 V, three-phase, four-wire, supply is available for loads up to 500 kVA demand load (1000 kVA under special circumstances as determined by the Distributor),*

OR

When the Customer or Developer provides a distribution vault on private property;

- (i) at 208/120 V or 600/347 V, three phase, four wire supply is available for loads up to 1500 kVA demand load (i.e. – 3 x 500 kVA, single phase),*

OR

Where the Customer or Developer provides a power class vault on private property;

- (i) fed from 13.8/8 kV primary at 208/120 V or 600/347 V, three phase, four wire, supply is available for loads up to 2500 kVA demand load (i.e.- three phase),*
- (ii) fed from 27.6/16 kV primary at 208/120V or 600/347 V, three phase, four wire, supply is available for loads up to 4000 kVA demand load (i.e. – three phase)*

When the Customer requires voltages other than at the available Supply Voltage, or demands by a single occupant exceed 4000 kVA, transformation requirements will be determined by the Distributor.

2.3.5 Voltage Guidelines

In this section the Distributor should specify what voltages their customers can reasonably expect, with reference to *CSA Standard CAN3-235 current edition*.

For example:

The Distributor maintains service voltage at the Customer's service entrance within the

guidelines of C.S.A. Standard CAN3-C235-87 (latest edition) which allows variations from nominal voltage of,

6% for Normal Operating Conditions

8% for Extreme Operating Conditions

Where voltages lie outside the indicated limits for Normal Operating Conditions but within the indicated limits for Extreme Operating Conditions, improvement or corrective action will be taken on a planned and programmed basis, but not necessarily on an emergency basis. Where voltages lie outside the indicated limits for Extreme Operating Conditions, improvement or corrective action will be taken on an emergency basis. The urgency for such action will depend on many factors such as the location and nature of load or circuit involved, the extent to which limits are exceeded with respect to voltage levels and duration, etc.

2.3.6 Back-up Generators

Distributors should include statements describing requirements for back-up generation in this section.

For example:

Customers with portable or permanently connected emergency generation capability shall comply with all applicable criteria of the Ontario Electrical Safety Code and in particular, shall ensure that customer emergency generation does not back feed on the Distributor's system.

Customers with permanently connected emergency generation equipment shall notify their Distributor regarding the presence of such equipment.

2.3.7 Metering

In this section, the Distributor should specify the options available to the Customer for metering equipment. The Distributor should also outline the technical requirements including location and associated main switch.

General

For example:

Generally, metering will be at utilization voltage. Where the Distributor provides primary transformation, primary voltage metering will be allowed only in special circumstances following full discussion with the Distributor. However, primary transformation supplied and owned by the Customer must be primary-metered, unless the building qualifies for individual

tenant metering.

The meter shall be located as near as possible to the service entrance box.

The meters shall be grouped where practicable and be accessible from a public area. Either a dual locking arrangement or a key box arrangement will be required on the access door. In any case, a copy of the metering layout plan shall be forwarded to the Distributor for review.

Where meters are grouped outside, the minimum height to the bottom of the access door shall not be less than 460 mm (18 in.).

All general rate services will be metered up to 50 kilowatts by a watt-hour meter, and over 50 kilowatts by a demand watt-hour meter.

For all services, the Customer shall supply CSA approved square type King Size meter socket bases with the number of jaws indicated for the appropriate service type.

Non-residential or mixed-use buildings will normally be bulk metered by a single meter. However, where specific areas are clearly and permanently defined and in other respects as a separate entity, individual metering of the loads will be considered.

In all installations where the Customer requests revenue metering remote from the secondary entrance equipment or downstream from a Customer-owned dry-core transformer, provisions are required for a bulk meter directly after the main switch. This bulk metering is required in addition to any public metering provisions. The Customer will be required to contribute to the cost of the metering installation.

The location of the indoor or outdoor meter shall be readily accessible at all times and acceptable to the Distributor. The inside meter shall not be in a bathroom, stairway, behind an oil tank, directly under a water or steam pipe or within 460 mm (18 in.) of water, gas, or steam pipes. A space of 910 mm (36 in.) clear of all obstructions shall be provided in front of the meter and service panel. If a meter is required to be recessed or enclosed after installation, prior approval shall be obtained from the Distributor.

Normally the service to a house will not be energized until the outside finish in the area of the revenue meter has been completed. If exceptions are made to this, then the general contractor constructing the home will be responsible for ensuring that the meter is suitably protected while work is being done on the exterior wall adjacent to the meter. As a minimum, protection shall consist of a wooden box, at least 250 mm (10 in.) deep and constructed to fit around the meter socket base. The general contractor will be entirely responsible for all costs for materials and labour for repairing or replacing a damaged meter.

When a disconnect device has been locked in the "OFF" position by the Distributor, under no circumstances shall anyone remove the lock and energize it without first receiving approval from the Distributor.

Where aluminum conductors are used, service entrance equipment must have CSA approval for aluminum conductors.

All disconnect switches and circuit breakers on the line side of the Distributor metering shall have provisions for padlocking. This includes feeder breakers supplying dry-core transformers which in turn feed meter centers.

Regardless of any charges for metering installations, all metering equipment shall remain the property of the Distributor and maintenance of this equipment shall be the Distributor responsibility.

Current Transformer Boxes

Where current transformers are required, the Distributor should outline the technical requirements to be followed for such installations.

For example:

Where a current transformer box is required, it shall be CSA approved, painted or galvanized, made of No. 16 gauge sheet metal and include a provision for sealing. A removable plate shall be provided in the box for mounting the equipment, unless the box is mounted on a wooden wall.

As an alternative to a separate CT box and meter, a single enclosure combining both functions may be feasible. Contact the Distributor for details.

Where current transformers are to be installed in the secondary bus of metal clad switchgear, shop drawings must be submitted to the Distributor to ensure that the CTs will fit. In cases where the CTs only meter a portion of the metal clad switchgear (such as public loads), a separate disconnect switch must be installed ahead of the metering compartment so that the service can be de-energized without any interruption to the main service supply. Generally, one public meter only will be allowed. Additional public meters will require authorization from the Distributor.

Where a current transformer box is required, its size will depend on the size of the service conductors to be used. The relationship is as follows:

Up to and including 500 MCM inclusive, use 910 mm x 910 mm x 300 mm (36 in. x 36 in. x 12 in.) CT box.

Above 500 MCM, use 1220 mm x 1220 mm x 300 mm (48 in. x 48 in. x 12 in.) CT box.

Conductors should enter the current transformer box at the top and leave at the bottom, or vice versa. If this cannot be arranged, the next largest CT box must be used to enable conductors to be trained in place. Where parallel conductors are used, the sum of the conductors will determine the size of the CT box to use. In all cases the Customer shall supply suitable cable termination lugs.

On all electrical services that require current transformers and the neutral for metering, an isolated neutral block shall be provided in the current transformer box.

Interval Metering

Where interval metering is required or requested, the Distributor should outline the technical requirements to be followed for such installations. Included with the technical specifications should be the conditions under which interval metering will be supplied.

For example:

The Distributor meters some Customers using pulse-recording meters, which are interrogated remotely. For all general service Customers with loads exceeding 1000 kW, and any Customer requiring pulses for Spot Market Price Pass-through, the Customer shall provide the following facilities:

A metering board 1.2 m x 1.2 m x 16 mm (4 ft. x 4 ft. x 5/8 in.) plywood exclusively for The Distributor metering plant and equipment.

A 13 mm (1/2 in.) conduit from the telephone entrance equipment and a 1 ML direct dial voice quality telephone line supplied by the Customer which is active 24 hours a day to the metering location extension jack which is mounted on the metering board. This phone line must be installed and functioning prior to the new service being energized.

Meter Registration

The Distributor should also outline the process for reading the meter and for handling meter registration problems.

For example:

The Distributor or its agents shall have the right to read any of the Distributor's electricity meters on the Customer's premises. All the Distributor metering equipment located on the

Customer's premises is in the care and at the risk of the Customer and if destroyed or damaged, other than by normal usage, the Customer will pay for the cost of repair or replacement.

Final Meter Reading

When a service is no longer required, or if the Customer is switching Energy Providers, the Customer shall provide the Distributor sufficient notice of the date so that a final meter reading can be obtained. The Customer shall provide access to the Distributor or its agents for this purpose.

If a final meter reading is not obtained, the Customer shall pay a sum based on an estimated demand and/or energy for electricity used since the last meter reading.

Faulty Registration of Meters

Metering electricity usage for the purpose of billing is governed by the federal Electricity and Gas Inspection Act and associated regulations, under the jurisdiction of Measurement Canada, Industry Canada. The Distributor's revenue meters are required to comply with the accuracy specifications established by the regulations under the above Act.

In the event of incorrect electricity usage registration, the Distributor will determine the correction factors based on the specific cause of the metering error and the Customer's electricity usage history. The Customer shall pay for all the energy supplied, a reasonable sum based on the reading of any meter formerly or subsequently installed on the premises by the Distributor, due regard being given to any change in the character of the installation and/or the demand.

If the incorrect measurement is due to reasons other than the accuracy of the meter, such as incorrect meter connection, incorrect connection of auxiliary metering equipment, or incorrect meter multiplier used in the bill calculation, the billing correction will apply for the duration of the error. The Distributor will correct the bills for that period in accordance with the regulations under the Act.

Meter Dispute Testing

Metering inaccuracy is an extremely rare occurrence. Most billing inquiries can be resolved between the Customer and the Meter Service Provider without resorting to the meter dispute test.

Either the Meter Service Provider or the Customer may request the service of Measurement Canada to resolve a dispute. If the Customer initiates the dispute, the Meter Service Provider will charge the Customer a meter dispute fee if the meter is found to be accurate and Measurement Canada rules in favor of the utility.

2.4 Tariffs and Charges

2.4.1 Service Connection

The Distributor should outline the rates they have established for providing the customer with a connection to the electrical distribution system and services all services provided by the Distributor as per the rules and regulations laid out by all applicable codes.

2.4.2 Energy Supply

The Distributor should outline the process for providing the customer with Standard Service Supply as per the rules and regulations laid out in the Retail Settlements Code and the Standard Service Supply Code.

The Distributor should outline the process for providing the customer with Supply through a Retailer as per the rules and regulations laid out in the Retail Settlements Code.

The Distributor should outline the process for wheeling of energy and all associated tariffs.

2.4.3 Deposits

The Distributor should outline the deposit and prudential requirements for providing the customer with Supply through Standard Service Supply or through a Retailer, as per the rules and regulations laid out in the Retail Settlements Code.

2.4.4 Billing

The Distributor should outline the billing methods and billing cycles they have established for providing the customer with Supply through Standard Service Supply or through a Retailer as per the rules and regulations laid out in the Retail Settlements Code.

2.4.5 Payments and Late Payment Charges

The Distributor should outline the payment methods they have established for providing the customer with Supply through Standard Service Supply or through a Retailer as per the rules and regulations laid out in the Retail Settlements Code.

For example:

Bills are rendered for distribution services and electrical energy used by the Customer. Bills are payable in full by the due date. Otherwise, a late payment charge will apply. Where a partial payment has been made by the Customer on or before the due date, the late payment penalty will

apply only to the amount of the bill outstanding at the due date, exclusive of arrears from previous billings.

Outstanding bills are subject to the collection process and may ultimately lead to the service being discontinued. Service will be restored once satisfactory payment has been made. Discontinuance of service does not relieve the Customer of the liability for arrears.

The Distributor shall not be liable for any damage on the Customer's premises resulting from such discontinuance of service. A reconnection charge will apply where the service has been disconnected due to non-payment.

The Customer will be required to pay additional charges for the processing of non-sufficient fund (N.S.F.) cheques.

Customers will pay special charges and deposits, on request, which may arise from a variety of conditions such as:

- *Energy Deposit. As a guarantee of payment of energy bills some Customers will be required to pay a deposit to the Distributor.*
- *Transfer Charge. A change of occupancy charge will apply to all accounts taken over by a new Customer.*
- *Collection Charge. It is sometimes necessary, for the Customer's convenience, for a Distributor's employee to visit a Customer's premises to collect payment for an account. There will be a charge for this service.*

2.5 CUSTOMER INFORMATION

Section 11 of the Retail Settlement Code specifies the rights of consumers and retailers to access current and historical usage information and related data and the obligations of distributors in providing access to such information. Reference to the RSC should be made here.

The process for handling requests for information outside of the requirements of the RSC should be detailed in this section.

For example:

Information subject to privacy regulations

Load profile information

SECTION 3 CUSTOMER SPECIFIC

The Customer Specific section should contain references to services and requirements, which are specific to individual Customer classes. This section should cover such items as Metering, Service Entrance Requirements, Delineation of Ownership, Special Contracts, etc. The following are examples of Customer Specific Sub-sections. It is recognized by the Distribution System Code that Customer Classifications are unique to each Distributor. The Distributor is not limited by these examples to the range and scope of their Customer Classifications. Each Distributor should therefore review their current Classifications and ensure that all of their existing Customer Classifications are adequately covered. In this section the Distributor should specify what their requirements are with respect to inspection of civil work installed by a customer or it's contractor and not covered by ESA.

3.1 Residential

Include all items that apply specifically to Residential Customers not covered under the General section.

For example:

This section refers to the supply of electrical energy to residential Customers residing in detached or semi-detached dwelling units, as defined in the local zoning by-law.

3.1.1 General

For example:

Energy is supplied single phase, 3-wire, 60-Hertz, having a nominal voltage of 120/240 Volts, up to maximum 200 amps per dwelling unit.

There shall be only one Delivery Point to a dwelling.

In circumstances where two existing services are installed to a dwelling, and one service is to be upgraded, the upgraded service will replace both of the existing services.

The Distributor will maintain services installed by the Distributor or an approved contractor, using approved materials, unless specifically documented otherwise to the Customer.

Where surface restoration by the Distributor is required following any repairs or maintenance to a service, the Distributor will provide only soil, sod, gravel or asphalt.

3.1.2 Early Consultation

For example:

The Customer shall supply the following to the Distributor well in advance of installation commencement:

- (a) Required in-service date*
- (b) Requested Service Entrance Capacity and voltage rating of the service entrance equipment*
- (c) Locations of other services, gas, telephone, water and cable TV.*
- (d) Details respecting heating equipment, air-conditioners and any appliances which demand a high consumption of electrical energy*
- (e) Survey plan and site plan indicating the proposed location of the service entrance equipment with respect to public rights-of-way and lot lines*

3.1.3 Point of Demarcation

The Distribution System Code requires that the Distributor establish a Point of Demarcation for each Customer Classification. In keeping with the Non-Discriminatory Access requirements of the Act, the Point of Demarcation must be the same for all customers within the same Customer Class. This section should designate a Delivery Point.

For example:

A residential customer delivery point is at the meter. This supply point might be located on an adjacent property from which the Distributor has an authorized easement. In all cases the final delivery point will be the decision of the Distributor.

The Customer must obtain a Delivery Point Location from the Distributor before proceeding with the installation of any service. Failure to do so may result in the Delivery Point having to be relocated at the Customer's expense.

3.1.4 Access

For example:

Service locations requiring access to adjacent properties (mutual drives, narrow side setbacks, etc.) will require the completion of an easement or a "Letter of Permission" from the property owner(s) involved.

The Customer will provide unimpeded and safe access to the Distributor at all times for the purpose of installing, removing, maintaining, operating or changing metering and distribution equipment.

3.1.5 Metering

For example:

The owner will supply and install a meter socket acceptable to the Distributor. Meter sockets will be directly accessible to the Local Distribution Company staff and:

Mounted on the exterior of the building within 3 meters of the front of the building and 1.7 meters from the finished grade to the center of the meter.

Installed ahead of (on the line side of) the main disconnect switch.

Complete with an acrylic inner collar approved by the Distributor.

OR

For all new services or changeover services where the standpipe, the conductors in the standpipe, or the service entrance switch are changed, the contractor shall supply a 4-jaw king size meter socket base (either 100 amp or 200 amp). This meter socket base shall be installed outside in a location that is accessible and approved by the Distributor. Maximum height allowed to the center of the socket base is 1830 mm (6 ft.)

For residential underground services to new buildings the meter shall be located within 1000mm of the front of the building. A clearance of 910mm (3 ft.) is required between the meter and the property line. For existing underground services which must be relocated or upgraded, the existing entry location to the house may remain provided that the meter is moved outside and is not obstructed and that the Distributor has access at all times to read or replace the meter.

3.1.6 Inspection

For example:

Prior to energization of the service the Local Distribution Company requires notification from The Electrical Safety Authority that the electrical installation within a building has been inspected and approved by the Electrical Safety Authority.

Provision for metering shall be inspected and approved by the Distributor prior to energization.

All services are generally installed by the Distributor, or by a Distributor-approved Contractor. The Customer may install only trenching and ducting, at the Customer's option. In the latter

case, all work done by the Customer shall be as specified by the Distributor and subject to inspection by the Distributor.

3.2 General Service

Include all items that apply specifically to General Service customers not covered under the General section.

3.2.1 General

This section refers to the supply of electrical energy to Commercial buildings.

For example:

Commercial buildings are defined as buildings which are used for purposes other than single family dwellings.

3.2.2 Early Consultation

For example:

Detailed regulations cannot be stated which would be applicable to all cases, therefore the Owner will consult with the Distributor in the early planning stages to ascertain the Distributor's requirements.

The Owner shall submit to the Distributor the following information:

- (a) required in-service date.*
- (b) voltage requirements.*
- (c) estimated initial Maximum Demand.*
- (d) estimated future Maximum Demand.*
- (f) specific listing of the type of loads for lighting, motor, heating, air conditioning or other.*
- (g) number of suites and the areas of each.*
- (h) grading plan and site plan, to scale, showing the apartment or office building in relation to existing or proposed property lines, and other buildings or structures such as parking garages and loading ramps. The plans shall include vertical and horizontal views of the proposed incoming duct bank from the Point of Entry to*

the Delivery Point.

- (i) *plan, to scale, of the area in which the transformer vault is to be located, showing all details of the vault.*
- (j) *plan, to scale, showing the electrical room and provision for the metering equipment.*

3.2.3 Point of Demarcation

The Distribution System Code requires that the Distributor establish a Point of Demarcation for each Customer Classification. In keeping with the Non-Discriminatory Access requirements of the Act, the Point of Demarcation must be the same for all customers within the same Customer Class. This section should designate a Delivery Point.

For example:

A general customer delivery point is at the padmount, or as otherwise set by the distributor. This supply point might be located on an adjacent property from which the Distributor has an authorized easement. In all cases the final delivery point will be the decision of the Distributor.

The Customer must obtain a Delivery Point Location from the Distributor before proceeding with the installation of any service. Failure to do so may result in the Delivery Point having to be relocated at the Customer's expense.

3.2.4 Supply Voltage

For example:

- (a) *A Commercial building is supplied at one service voltage per land parcel.*
- (b) *Single-phase energy is supplied at a nominal value of 120/240 volts, three-wire, up to 100 Kilowatt Demand.*
- (c) *The Owner shall make provision to take delivery at one of the nominal utilization voltages as specified by the Distributor. The Owner shall obtain prior approval from the Distributor for the use of any specific voltage at any specific location.*

3.2.5 Underground Service

For example:

Under normal circumstances, Commercial buildings are supplied electrical energy by an underground service through a single point of entry for each land parcel, at a location specified

by the Distributor.

3.2.6 Location of Transformers

For example:

The transformers are normally located in the Owner's transformer vault.

For very small office or apartment buildings the Distributor may, at its discretion, permit the use of pad mounted or pole mounted transformers, provided the Owners' Main Service Entrance does not exceed 600 Amperes.

3.2.7 Supply of Equipment

For example:

The Distributor supplies, installs and maintains:

- (a) *primary switchgear.*
- (b) *primary transformation equipment, up to and including the secondary bushings, to a maximum of 1,500 kVA per building.*

Note: The Distributor may, at its discretion, supply transformation up to 3,000 kVA in certain locations.

- (c) *meter and secondary metering transformers.*
- (d) *secondary cables and connectors within the transformer vault or, where the service entrance capacity exceeds 800 Amperes, secondary bus-bars.*

Note: Maintenance or replacement of all underground looped cables which form part of the Distribution plant circuits shall be performed by the Distributor. Following maintenance, surface restoration by the Commission will include only soil, sod, gravel or asphalt. Where damage can be shown to be the Owner's liability, maintenance and repair are at the Owner's expense

The Owner shall supply, install and maintain:

- (a) *Transformer vault and associated equipment.*
- (b) *Concrete-encased cable duct bank from the point of entry to the vault designed by the Owner to the Distributor's specifications.*

- (c) *Where the Distributor has determined that cables may not be readily pulled through the duct bank, the Owner shall also design, supply, install and maintain a pulling manhole or pit on the property to the Distributor's specifications. Where the Distributors' distribution system is underground the Owner shall be responsible for the cost of supply and installation of ducts to the Distributor's specifications at locations where driveways cross the distribution system. Ducts shall be installed prior to the final paving of driveways secondary service entrance equipment. This shall include a cable tray for secondary cables within the transformer vault for service entrance capacities up to and including 800 Amperes. For all service entrance capacities, only one main secondary disconnect device is to be installed per transformer vault, unless otherwise specified by the Distributor.*
- (d) *Dry-type transformers for special utilization voltages.*

3.2.8 Short Circuit Capacity

For example:

The Owner shall ensure that his service entrance equipment has an adequate short-circuit interrupting capability. The Commission will advise, on request, the maximum available short-circuit symmetrical in-rush Amperes at any specific location.

3.2.9 Access

For example:

Service locations requiring access to adjacent properties (mutual drives, narrow side setbacks, etc.) will require the completion of an easement or a "Letter of Permission" from the property owner(s) involved..

The Customer will provide unimpeded and safe access to the Distributor at all times for the purpose of installing, removing, maintaining, operating or changing metering and distribution equipment.

3.2.10 Metering

For example:

Where individual metering is used, the service boxes must be identified with unit numbers clearly painted on the box in figures two inches high. Units shall be numbered and a floor plan shall be mounted in a suitable manner in each meter room, indicating the area to which each service box supplies power. The service will not be connected unless the numbers on the service box and those on the stores or units correspond and the plan is posted. The Owner shall inform the

Distributor if there are changes made in the unit numbers.

Single Phase, Three Wire - 120/240 Volts

Services up to and including 200A require a 4-jaw King Size meter socket base installed on the load side of the disconnect switch supplying each individual service.

Services over 200A require a current transformer box installed on the load side of the disconnect switch supplying each individual service.

Where load changes are unlikely, gang meters may be allowed before a main switch at the discretion of the Distributor. The total of the ratings of the overcurrent devices (maximum allowable) must not exceed the rating of the incoming supply conductors. This gang meter base is not to be rated more than 400A at 120/240V.

600v, Three Phase, 3 Wire

Services up to and including 200A require a 7-jaw meter socket base installed on the load side of the disconnect switch supplying each individual service.

Services over 200A require a current transformer box installed on the load side of the disconnect switch supplying each individual service. A 13-jaw transformer rated socket meter base with a test switch compartment must be provided and installed by the owner.

When a 600V, three phase, 3 wire service is supplied from the 600Y/347V, three phase, 4 wire system, it must be metered as a three phase, 4 wire service with the neutral brought out. A full size neutral shall be installed from the transformer vault or padmount to the metering location.

208y/120v, Three Phase, 4 Wire

Services up to and including 200A require a 7 jaw meter socket base installed on the load side of the disconnect switch supplying each individual service. For services of 208Y/120V, two phases and neutral, a 5-jaw meter socket base is required.

Services over 200A require a current transformer box installed on the load side of the disconnect switch supplying each individual service. A 13-jaw transformer rated socket meter base with a test switch compartment must be provided and installed by the owner.

600y/347v, Three Phase, 4 Wire

Services up to and including 200A require a 7-jaw meter socket base installed on the load side of the disconnect switch supplying each individual service.

Services over 200A require a current transformer box installed on the load side of the disconnect

switch supplying each individual service. A 13 jaw transformer rated socket meter base with a test switch compartment must be provided and installed by the owner.

The Distributor will not supply 3 wire services (2 phases and neutral) or 2 wire services (1 phase and neutral) from the 600Y/347V, three phase, 4 wire system.

3.3 General Service (Above 50 kW)

Include all items that apply specifically to General Service Customers (above 50 kW) not covered under the General section. Describe the criteria to determine how a customer is classified as being above 50 kW.

3.4 General Service (Above 1000 kW)

Include all items that apply specifically to General Service Customers (above 1000 kW) not covered under the General section. Describe the criteria to determine how a customer is classified as being above 1000 kW.

3.5 Embedded Generation

This section should include all terms and conditions applicable to the connection of embedded generation to the distributor (e.g., application process, engineering standards and operating agreements).

3.6 Embedded Market Participant

Criteria for a Customer that is classified as being a Market Participant needs to be established. This section should describe any specific requirements for Customers that also are Market Participants.

3.7 Embedded Distributor

This section will include all terms and conditions applicable to the connection of an embedded distributor.

3.8 Unmetered Connections

This section will include all terms and conditions applicable to unmetered connections such as but not limited to the following:

3.8.1 Street Lighting

3.8.2 Traffic Signals

3.8.3 Bus Shelters

SECTION 4 GLOSSARY OF TERMS

The Conditions of Service document may contain a variety of terms that should be defined in the context of this document. Where possible, glossary terms should reflect definitions in existing documents that apply to the distributor, such as the DSC, the licence and Standard Supply Service Code. The text of the Conditions of Service document should be used to expand on these definitions as applicable to the Distributor.

Examples of terms that should be defined:

Customer
Connection
Distributor
Embedded Distributor
Embedded Generator
Interval meter
Metering installation
Retailer
Point of demarcation

SECTION 5 APPENDICES

The following are samples of documents that could be appended to the Distributor's Conditions of Service document:

1. Economic Evaluation Model for Distribution System Expansion
2. Sample Operations Agreement between the Distributor and an Embedded Generator.
3. Standard Connection Agreements.

1.3 DISTRIBUTOR'S RESPONSIBILITIES FOR CUSTOMER INFORMATION

[FINALIZED: MARCH 10, 2000]

Issue Statement:

Due to the many changes in the Industry regarding the structure and operations of the distributors, customers no longer will be entirely dependent on their existing distributors for all of their services. The introduction of retailers, the unbundling of services and bills, and in some instances the elimination of the entity they may have dealt with for generation, is likely to create unease with many customers.

In light of this, it will be imperative that customers are advised of upcoming changes that may affect them prior to the opening of the new market, as well as throughout future evolution. Services that were taken for granted will not necessarily be made available to customers, or may be still available on a fee for service basis. This is a radical change in some cases, and the unrest created by these drastic changes could make the transition to the new market difficult for all involved.

Well-informed customers will find the transition to the new system much easier to bear. In addition, planned, accurate and timely information flow will reduce the burden on distributors in relation to the anticipated increase in customer calls looking for answers. The issue is:

What are a distributor's obligations with regards to the provision of information to customers within the distributor's Licensed Service Area?

Options

1. **Minimalist Approach:** Distributors will provide all information that they are mandated by Acts, Regulations and Codes to provide to customers. As it is prescriptive elsewhere, the DSC would be silent on this issue.
2. **Prescriptive Approach:** The DSC will specify for distributors what their obligations will be in responding to requests for information by customers. The DSC will include such issues as time lines for response, customer information request procedures and applicable fees
3. **Modified Prescriptive Approach:** The DSC will provide direction for distributors, in the provision of information, in response to a request from a customer. The DSC will require that a distributor describe its procedures and fees in the 'Conditions of Service' document.

Background Information

As the traditional primary contact, customers are likely to expect their distributors to provide answers on issues such as:

- ◆ Generic Market Place Information (how it works)
- ◆ Consumption History
- ◆ Who are the legitimate [licensed] retailers?
- ◆ Who are the generators, and how can consumers purchase Green Power, etc.
- ◆ Rate Information & Billing Complaints (concerns of high bills and confusion on new charges)
- ◆ New Conditions of Service

In addition, distributors can expect retailers to request information typically stored in a distribution system customer database such as:

- ◆ Specific Customer Information (address, name, etc)
- ◆ Customer Payment and Credit History
- ◆ Customer and Distributor Load Characteristics

Utilities traditionally have provided free information to customers with regards to energy efficiency, customer consumption statistics, high bill inquiries, safety issues, and other consumer education matters.

Recently, in preparation of unbundling of services, some utilities have begun to charge for some of these services. An example of these charges is a small fee for providing a letter of reference for a customer that is moving from one utility to another.

Distributors traditionally have participated in public education with regards to Safety and Energy Efficiency. In the new environment, where rate of return and profit margins take over distribution of power at cost, it may not be in the distributor's best interest to promote reduced power consumption amongst their customers. Safety will most likely remain as an issue dealt with by distributors primarily due to corporate responsibility for public and employee safety; proving due diligence can be viewed as a good insurance policy.

In the past, distributors have been bound by the Freedom of Information Act (FOIA), with respect to protection and dissemination of customer information. However, as distributors form their

new business units, they will not be bound by the same rules, and will need to ensure that information contained within a company's records are not misused.

At the present time, customers purchase both energy and distribution services from the same entity. It was therefore easy for a customer to know who to call for information about an electricity bill. In the new market, this will not necessarily be the case. A customer may call the distributor about issues or questions that are associated with a retailer.

Additionally, a distributor seldom had cause to respond to an outside agency requesting customer billing or payment history. With the introduction of competition, retailers will be interested in gathering customer information in an effort to make wise decisions with regards to marketing, power purchases and for use as a tool for limiting exposure to risky customers.

Summary of Discussion

Discussion centered around the types of information that market participants may request.

Generic Market Place Information (how it works)

It is anticipated that most of the information required by customers with respect to the new market operations will be disseminated prior to market opening by government agencies. The public needs to be informed sooner rather than later, as retailers will be licensed to knock on doors as of March 2000. The DSC should target the ongoing information as it pertains to specific distributor's responsibilities rather than document start-up practices. Information regarding the start up of the market should be addressed separately by each of the market participants – Government, regulators (the OEB and the IMO), generators, transmitters, distributors, and retailers.

Consumption History

The process of compiling, printing, and mailing a billing/consumption history for a customer can be a simple and inexpensive task, or a difficult and costly one, depending on the abilities and systems in place within a distribution company. In the past, under the cost of power regime, and when the market was closed, requests for this type of information were rare, and easily covered through operational costs. The new market changes are likely to create a higher volume of requests for this type of information, particularly by customers and their prospective retailers wishing to investigate opportunities to profit in the new market. The issue can be viewed from two perspectives.

- a) The consumption and billing history actually belongs to the customer.
- b) Past history beyond the previous billing period belongs to the distributor as a record of its

distribution activities.

Regardless of how the courts were to deal with the issue of who owns the data, the primary focus would be on the entitlement and how the data is to be used, rather than on the right of the record holder to charge for providing the information in a formatted manner. Every other business that carries historical data relating to customers' activities (e.g., credit card companies, banks, government agencies) charge a fee for compiling historical data and providing it at a customers' request.

Each customer has already been provided with the information that would be requested in the form of monthly invoices. The issue is merely one of who should do the work of compiling the information in a clear and formatted version: the customer - who could gather their previous bills and perform the task manually, or the distributor - who in many instances would perform this task through billing and settlement computer systems. One could argue that this would not be an onerous task on the distributor, as the information is easily accessible in a computer system. However, although distributors have a clear mandate to maintain records for a specified period of time, not all distributors chose to computerize this information. In these cases, the task becomes a time consuming one, where a paid employee must review monthly meter reading records for the historical period requested and manually copy the information to create the requested historical report. Even for those distributors wishing to computerize their existing paper records, there will be a cost that they should be allowed to recover. In fact, it could be argued that a distributor should be allowed to charge what the market can bear for such information. However, one should be mindful of the fact that charges for such information could impede the progression of competition by increasing costs to retailers.

Many of the questions raised in this discussion could be classified as transitional issues; once the market place has settled down, these issues may or may not be a problem. If there is an ongoing cost for provision of this data to a small group of consumers, then it could be argued to be an issue of cross-subsidization.

The Retail Settlement Code addresses the issue as to frequency, type of data included and the associated charges for information related to usage.

Who are the legitimate [Licensed] Retailers?

Energy Marketers (Retailers) will be new players in the market; new players that electricity customers have not had to deal with in the past. As experiences with the Gas and Long Distance markets have shown, marketers will be using many methods of enticing prospective customers to sign up for service, such as Telephone Marketing, Fliers, Radio and Newspaper Advertising, and door to door sales calls.

As the local and historic provider of electricity services for the past one hundred years, and due to

the trust relationship most customers have with their existing distributor, customers will most likely call the local distributor for information on whom these new people are that are calling on them. Once again, most of this activity will be occurring prior to market opening. However, there will be an ongoing concern as the market evolves that customers will wonder who the legitimate players may be. The distributor being in the position of total impartiality with regards to the retail of energy will still be seen in most customers' eyes as a reliable source of information. For this reason we anticipate that the distributor will be the prime contact when a customer has a question about a retailer whom has contacted the customer. In keeping with the impartiality constraints, the distributor's staff should not be placed in a position of rating the retailers as to better or best, nor should they be policing the activities of these marketers.

Retailers who are licensed by the OEB will be operating under a Code of Conduct and under the constraints of their licence. In addition, each retailer would be required to make arrangements with the local distributor for billing purposes. Subsequently, the distributor will have knowledge of existing retailers in their territory, but not necessarily information with respect to the reliability and value of offerings the retailer may present to customers.

Who are the Generators, and how can consumers purchase Green Power, etc.

Customers will also have questions with regards to generators. Some will be looking for a variety of generation offerings such as Green Power. There will be requests with regards to where and how one can purchase non-nuclear or non-coal power. Customers will have fewer questions regarding this issue than those with respect to retailers; however, customers will expect the distributor to provide such information.

To provide this information, the distributor would first need to gather accurate information before it could pass it on to interested customers. While it would make little sense for every distributor to perform such research on generators that are connected to the IMO- controlled grid, the local distributor may have specific information for generators that are embedded in the distributor's territory. However, this could be a new market niche for retailers, or even a fee for service for a research company. On the other hand, since all generators must be registered with the IMO and licensed by the OEB, it may be more efficient for distributors to refer inquiries to these government agencies that would provide this information.

Rate Information & Billing Complaints (concerns of high bills and confusion on new charges)

With the unbundling of services and the advent of SSS, it is anticipated that retailers will offer a variety of new billing options to customers. It is also expected that the delineation of unbundled costs on customer bills will be a cause for considerable confusion on the part of the customer. The addition of split bills also is likely add to the level of potential confusion with regards to responsibility for handling complaints on high consumption bills.

Customer complaints may also result from the inability of market participants to deliver on promised savings. Experience has shown that when Gas marketers promised 50 percent savings for switching fuels, it was the electric utilities that were called for high bill complaints when the electric bills did not drop by the 50 percent margin. This confusion was despite the fact that it was the salesman at the door, not the utility, who promised the big savings. Meter verification, customer visits, and education on energy consumption were the typical tools utilized by utilities to assist customers in reconciling their concerns.

With energy being treated as a pass-through, the responsibility for reconciling high bill complaints should not rest solely on the distributor's shoulders. However, being the provider of the monthly bills, the distributor is expected to be the primary contact from the perception of the customer.

The metering sub-group will deal with the process of handling concerns on meter accuracy. In any case, an increase in the number of customer requests is expected in this area. Distributors should be granted the right to cover their costs for time spent investigating meter accuracy complaints when the meter is found not to be faulty.

New Conditions of Service

Due to the new requirements of the DSC, every distributor will have a "Conditions of Service" Document, which must be made available to the public for review. Although there will be only a few distributors who will be in a position of creating an entirely new document, all distributors will be required to make at least some changes in order to reflect the requirements of the new Codes.

The "Conditions of Service" document is targeted to be the primary method of detailing the relationships between customers and distributors in regards to the variety of services offered. As a result, this document must be made available to the customers for review. The question is how. Should any customer be allowed to receive their own copy of the document free of charge, or should there merely be a copy readily available at the local office for the customers to review? A compromise of these two options would most likely be best. A customer should have access to the document, however if they wish to have specific sections for themselves for future reference, then they should be allowed to get a copy (perhaps at cost). Photocopies can be prepared at request and charged on a per page basis. Allowing individual customers to take copies does create a problem with ensuring that all customers are dealing with the most up to date version of information after changes have been made. In light of this a process must be established to ensure that all revisions are dated in such a way that they can be easily noted. Additionally, a distributor can elect to use the Internet as a communication tool to disseminate information to consumers.

Expecting distributors to keep a library type reference of who has what copy and which section would be unreasonable. A better option would be to ensure that when changes to the document

are made, there is a proper notification period to all customers by the distributor. This notification could be in the form of a note in the message section of the bills, or part of a memorandum included as a billing stuffer.

The next logical question with respect to changes to the Conditions of Service document then arises: Should customers have an opportunity for public input with regards to proposed changes? Keeping in mind that new distributors may no longer publicly owned, but a business corporation with shareholders, it may be presumptuous to request them to ask their customers for permission to change the document. Inviting input implies that the customer has the power to change the document, or at the very least has the power to influence the change. The distributor will answer not to the customers, but to the shareholder. Distributors will need to be responsive to their customers in order to ensure continued customer satisfaction; however, being responsive does not require obtaining advanced permission for instituting change. The responsibility for ensuring change is acceptable should be within the powers of the shareholder and the regulator, not the customer.

Consideration also must be given to the fact that distributors operate in a regulated environment bound under the Codes and Licenses issued to it. As the “Conditions of Service” document is a requirement of the OEB through the writings of the DSC, it should be noted that the ‘live’ document should be in the hands of the regulator at all times. This would ensure that should there be a dispute, the regulator has the tools at hand to rule on the issue.

It is in the best interest of all concerned not to have the document changed frequently. Stability in the market place should be protected where possible. However, in its infancy, the new market is liable to take on many twists which may force distributors to constantly review their “Conditions of Service” to remove offered services and to enhance them. Distributors should not be placed in a position where lack of ability to make adjustments to their document restricts their ability to maintain their viability in the market place. The document is a communications tool, not a piece of legislation. Tighter controls placed on a distributor’s ability to review their offerings to the customers could create very vaguely crafted documents that are open to varied interpretations. This could lead to difficult resolutions, as there would be a requirement to rule not on the substance but on interpretation of the challenged point.

Customer Payment and Credit History

Distributors currently have information relating to customer payment histories, which could prove to be valuable to retailers. From a retailer's perspective, a customer with a poor payment record is definitely more of a credit risk than one who has never missed a payment. Entering into the new field of energy sales in this province will carry significant risks to retailers. Some customers may be leery in the beginning, making choices very carefully, while others will take the opportunity to game the system to maximize their savings. Retailers will want to minimize their risk in whatever way possible, and having prior knowledge of payment histories is one tool most likely to be

pursued.

The question then arises as to whether distributors should be providing such information to retailers and/or anyone else for that matter. If the information is truly valuable as a tool for mitigation of risk for a retailer, and can legally be passed on by distributors, should distributors have the right to charge for providing the information when requested?

Distributors may not wish to provide such information. It is conceivable that since retailers have the opportunity to choose who they do business with, and distributors are in a position where they must supply as the default supplier, retailers will pick those customers who present the least amount of risk, and leave the balance on the shoulders of the distributors. Keeping payment histories confidential would reduce the possibility that a distributor is left with the more undesirable customer base.

Question – What are the legal responsibilities of a company with regards to privacy of Credit Histories?

Customer and Distributor Load Characteristics

Distributors also have a significant amount of data pertaining to historical load consumption by customer class, as well as by customer. This data can be a valuable tool for positioning of retailers in the market. There are many companies throughout the U.S. who gather similar information and market the data to a variety of businesses. Retailers of energy, manufacturers of energy efficiency products, and others, use energy consumption patterns as a basis for developing products and services to new markets. These companies also find this information valuable in reviewing the success or failure of their venture. As the possessor of this potentially valuable market information, should a distributor be allowed to sell it at will, or should there be constraints on how the data is handled?

In the past, distributors were readily allowed to pass on similar information under the constraint of ensuring that the information was depersonalized in such a way that it was not readily identifiable as belonging to any one individual customer. It is reasonable to expect the same limitations on distributors going forward. In addition, it would be unreasonable to prevent a distributor from earning a profit from the sale of such material if they find a market for it. There are specific limitations on customer specific information stipulated in the Affiliate Relationships Code, and these should not be contradicted in the DSC.

Recommendations

Option 3 – Modified Prescriptive Approach is recommended.

The DSC will provide direction for distributors in the provision of information in response to a

request from a customer. The DSC will provide that a distributor include their procedures and fees in the 'Conditions of Service' document. More specific details for each type of information are described below.

Generic Market Place Information (how it works)

Information regarding the start up of the market should be addressed separately by each of the market participants – the Government, Regulators (the OEB and the IMO), generators, transmitters, distributors, retailers, etc.

There being an inherent responsibility on distributors to assist in facilitating a successful market, a distributor should be required to provide information to the public on the progress of the market changes or at the very least be a conduit for Government agencies in disseminating such information.

Consumption History

The Retail Settlement Code addresses this issue as to frequency, type of data included and the associated charges for information.

Who are the legitimate [Licensed] Retailers?

In keeping with the impartiality constraints, a distributor's staff cannot be placed in a position of rating the retailers as to better or best, nor can they police the activities of these marketers. A listing of retailers who currently have billing arrangements with the distributor should be provided at the request of a customer. As indicated by the Affiliate Relationships Code, the list should in no way intimate one retailer as being superior to another. In addition to listing the retailers, the option of SSS should also be included in order that the customers not feel pressured to choose a retailer. The customer should have the right to choose not to choose.

Who are the Generators, and how they can purchase Green Power, etc.

Distributors should not be burdened with doing market research for their customers. Distributors should not be prevented from passing on information that they can readily obtain, nor should they be forced to gather information that serves them no purpose. The sale of Green Power etc. is a market niche, and as such, the responsibility for advertising of this product should be placed on the shoulders of those who wish to enter that market. Distributors should refer customers to government agencies such as the OEB and IMO when asked about different retailer products.

Rate Information & Billing Complaints (concerns of high bills and confusion on new charges)

With all energy being treated as a true pass-through, the responsibility for reconciling high bill

complaints should not rest solely on a distributor's shoulders. However, being the provider of the monthly bills, distributors are expected to be the primary contact from the perception of the customer.

Distributors should be granted the right to cover their costs for time spent investigating meter accuracy complaints when the meter is found not to be faulty. Additional assistance in the form of energy audits etc. are beyond the scope of their requirements, and it should be left up to the market to provide this service if there is a demand for it

New Conditions of Service

The "Conditions of Service" document is targeted to be the primary method of detailing the relationships between customers and distributors in regards to the variety of services offered by the distributor. As a result, this document must be made available to the customers for review. Notice of changes, made from time to time by the distributor, must be communicated to customers by the distributor through regular communication channels.

A current copy of the "Conditions of Service" must also be submitted to the OEB after any changes have been made. A covering letter outlining the changes from the previous document along with copies of the methods used to inform the customers must be included with any newly revised document.

Customer and Distributor Load Characteristics

A distributor may release information that has been aggregated sufficiently such that no individual consumer information can be identified. A fee may be charged for this information as approved by the Board.

Voter Summary

The majority was in favour of the recommendations.

Dissenting Opinions

Consumption History - An Opinion Contrary to the Retail Settlement Code

The Consumption History for any customers already has been supplied to the customer in the form of a monthly, itemized invoice. Distributors should be allowed to charge a reasonable rate for compiling and providing consumption history to a customer or his/her prospective retailer. The rate should be based on the actual cost of compiling the information, allowing for recovery of other costs related to the delivery of the information, Fax, Photocopying etc. The rate should be published and approved within the rate application of the distributor as a fee for service. To not charge the customer requesting this additional work is to impose a cross subsidization cost on all

customers for the benefit of retailers and those customers who seek an alternate supplier.

1.4 CONFIDENTIALITY OF CUSTOMER INFORMATION

[FINALIZED: MARCH 15, 2000]

Issue Statement

In fulfilling its distribution functions, distributors obtain consumer information. Consumer information includes information specific to a consumer such as load, payment history, meter type and service by competitive retailers. Most, if not all, of this consumer information is obtained by a distributor through provision of a monopoly service that is funded through rates. However, this information is valuable to third parties. The issue is:

How should the DSC address confidentiality of individual consumer information?

Options

1. Allow distributors to divulge consumer information at their discretion.
2. Allow distributors to divulge consumer information only at the request of the consumer.
3. Allow distributors to divulge consumer information to a third party for operation purposes, with no prohibitions on how that information may be used once it is released.
4. Allow distributors to divulge consumer information to a third party for operation purposes, and prohibit that information from being used for other purposes.
5. Prohibit distributors from divulging consumer information for any reason.
6. Remain silent on the issue of individual consumer information and allow conditions of licence and other codes to address confidentiality.

Background Information

The Transitional Distributor's Licence imposes certain restrictions on the provision of information. These restrictions include the following:

- 16.1 The Licensee shall not, unless necessary for compliance with the Market Rules or any Board approved code or standard, disclose specific information regarding a consumer, retailer, wholesale buyer, wholesale supplier, or a generator to any party unless the release of such information has been authorized by the particular consumer, retailer, wholesale buyer, wholesale supplier or generator.

- 16.2 The Licensee shall not disclose consumer information to a third party without the consent of the consumer in writing, except where consumer information is required to be disclosed:
- (a) for billing or market operation purposes;
 - (b) for law enforcement purposes;
 - (c) for the purpose of complying with a legal requirement; or
 - (d) for the processing of past due accounts of the consumer which have been passed to a debt collection agency.
- 16.3 Consumer information may be disclosed where the information has been sufficiently aggregated such that an individual's consumer information cannot reasonably be identified, but must be made available on a non-discriminatory basis.
- 16.4 The Licensee shall inform consumers regarding the paragraphs under which consumer information may be released to a third party without the consumer's consent.
- 16.5 The Licensee shall not use consumer information obtained for one purpose from a consumer for any other purpose without the consent of the consumer in writing.
- 16.6 The Licensee shall ensure that a third party does not use consumer information obtained for one purpose from the Licensee for any other purpose except for the reason for which it was originally disclosed in accordance with the first clause.

Section 11 of the Retail Settlements Code describes consumer information that a distributor must provide upon request of a consumer. This includes consumer name, address, load information, meter type, and other individual consumer information.

Subsection 2.4 of the Standard Supply Service Code allows a distributor to issue consumer specific information as required to provide SSS or as authorized by the consumer. This section also requires that a distributor take "all reasonable steps to ensure that a third party providing standard supply service on behalf of the distributor uses consumer-specific information obtained through the provision of standard supply service only to implement standard supply service."¹

For context in the area of competitive entities, the Electricity Retailer Code of Conduct also

¹ Standard Supply Service Code for Electricity Distributors, December 13, 1999, Subsection 2.4.2.

places restrictions on the way a retailer may use individual consumer information. A retailer is not allowed to use consumer information for other purposes without written permission from the consumer.

Implementation Issues

The first option is untenable given conditions in the Distribution Licence and Standard Supply Service Code.

Option three seems unworkable given section 16.6. of the Transitional Distribution Licence.

The fifth option also is unworkable because distributors that subcontract out billing or settlement functions will have to provide consumer information to the contracted entity. Option five also is impractical because it is in direct conflict with information provision requirements in the Retail Settlements Code that requires distributors to provide consumer information upon the request of the consumer.

Options two and four are addressed in other codes or licence conditions.

Summary of Discussion

Licence conditions and codes of conduct appear to address sufficiently the issue of confidentiality of information.

The licence requires that a distributor take all reasonable measures to ensure that a third party that obtains consumer information for purposes of operating the distribution system or providing distribution services does not use this information for purposes other than those for which it was obtained. Measures to ensure that a third party does not use consumer information for other purposes include contractual requirements that would prohibit a third party from using this information, mandatory firewalls within the third party, and contractual prohibition of the third party or its affiliate from operating in the distributor's service territory in a way that would benefit from having this information. As this licence condition would take precedence over any confidentiality clause in the DSC, a separate item in the DSC may not be necessary.

Recommendation

We recommend Option 6: remain silent on the issue of individual consumer information and allow conditions of licence and other codes to address confidentiality.

Conditions in a distribution licence address the need for a distributor to provide consumer information at the request of the consumer and for purposes of operation of the distribution system. If consumer information is provided to a third party for operation purposes, the distributor is required to ensure that a third party should not be allowed to use this information for its own purposes. To the extent that licence conditions do not address this issue in the future, the

DSC could be revised.

Voter Summary

Unanimous.

Dissenting Opinions

None.