Initial Written Comments Received in Response to Ontario Energy Board, October 16, Issues List

# **Synthesis of PBR Issues**

For Presentation at the Ontario Energy Board's Regional Stakeholder Consultation Workshops

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#### 1a. Most Appropriate PBR Scheme (26)

- ◆ Yardstick 8 \*
- ◆ Revenue Cap 3
- ◆ Price Cap 1
- Hybrid
  - Unstated
  - PC/Y 2
  - RC/Y 5
  - PC/RC 2
- ◆ No One Scheme 3
- No Stated Preference 2

<sup>\*</sup> Numbers to the right of titles or subjects indicate number of respondents mentioning this topic.

2a. Characteristics for Yardstick		<ul> <li>Energy Competition</li> </ul>		
Groups	23	<ul> <li>O&amp;M/Customer</li> </ul>	3	
<ul> <li>Number of Customers</li> </ul>	14	◆ Revenue/kWh	3	
◆ MEA	1	<ul><li>Km of Line</li></ul>	1	
◆ Load	9	<ul><li>Right of Way</li></ul>	1	
<ul> <li>Customer Density</li> </ul>	12	<ul><li>Voltage</li></ul>	3	
◆ Area	2	<ul><li>Distribution Design</li></ul>	1	
◆ Revenue	1	<ul><li>Underground</li></ul>	4	
<ul><li>Asset Value</li></ul>	1	<ul> <li>Transformer Assets</li> </ul>	1	
<ul><li>(Sustained) High Growth</li></ul>	5	◆ Financial	1	
<ul> <li>Customer Mix</li> </ul>	5	◆ Debt Load	1	
Geographic Location	10	<ul> <li>Generation Ownership</li> </ul>	2	
◆ Urban/Rural	8	<ul><li>Municipal Profile</li></ul>	2	
◆ Terrain	3	<ul><li>Service Standards</li></ul>	3	
◆ Climate	2			
<ul> <li>Seasonal Load</li> </ul>	1			



#### 2b. Similar/Dissimilar Groups (3)

- ◆ 10 Largest
- ◆ Large Urban Most Similar (Mississauga and Toronto); Large Southern Urban (i.e., Miss.) and Small Rural Northern (e.g., Great Lakes Power) Most Dissimilar
- ◆ Group Brampton, Burlington, Markham, Miss., Oakville, Richmond Hill, Vaughan, Pickering. These Not to Be Grouped with Hamilton, Ottawa, or London due to High Growth.

2c. Unique Characteristics for Grouping (7)		<ul> <li>24 Hour Control</li> </ul>	1
◆ Load Change	2	<ul><li>Underground</li></ul>	3
<ul> <li>Customer Density</li> </ul>	1	<ul> <li>Distribution Design</li> </ul>	2
<ul> <li>Amalgamation</li> </ul>	1	<ul><li>Infrastructure Age &amp; Type</li></ul>	1
◆ Weather	1	<ul> <li>Substation Assets</li> </ul>	1
◆ Location	2	<ul> <li>Development Charges</li> </ul>	2
◆ Terrain	1	<ul> <li>Negative Income</li> </ul>	1
<ul> <li>Marine Cable/River Crossings</li> </ul>	1	<ul><li>Debt Financing</li></ul>	1
<ul><li>Voltage</li></ul>	4	<ul><li>Utility Ownership</li></ul>	1
District Heating	1		

#### 2d. Miscellaneous Comments (1)

◆ Promote Aggressive Energy Efficiency (Bill Reduction, Competitive Economy, Job Creation, Deficit Reduction, Emissions, Public Health, Environment)

#### 3a. PBR Models Vary by Size or Circumstance (14)

- ◆ Yes 9
- ◆ No 5
  - Unless results are biased
  - Although may be necessary 1

#### 3b. Criteria or Circumstances to Employ

MEA
Customer
Density
Number
Mix
Avg. load
Growth
Peak
Geography
Urban/Rural
1

### 4a. Establishing Base Rates (19)

•	Cost of Service	4
•	No COS	1
•	External or Industry Indicator (not historical)	1
<b>*</b>	Historical Trends	3
	- 2 "future years"	2
	- 1992-1997	1
•	Peer Group Average	5
•	Current Rates	4
	- Except 10 largest	1
<b>♦</b>	Delay Until Understand PBR	1
<b>♦</b>	Consider	
	- Relationship costs	1
	<ul> <li>Valuation of investment</li> </ul>	1



### 4b. Implementation Issues (19)

<b>♦</b>	Minimize Rate Impact	5
<b>*</b>	Include 1 Time Transaction Costs	4
<b>*</b>	Consider Costs Such As - Development	4
	<ul><li>Expansions/amalgamations</li><li>Shared services for multiline utilities</li></ul>	11 1
<b>*</b>	Freeze Rates - Use 1999 data	1
<b>*</b>	Recommendations	
	- Use 1999 data	1
	- Delay until have new accounting system	1 1
	- Asymmetric info issue for historical data	1 4
	- Delay for implementation	1
	<ul> <li>Consider a ROA</li> </ul>	1



### 5a. Plan Term (16)

•	3 years	7
	- Initially 2	1
	<ul> <li>Review after 1.5</li> </ul>	1
	- Initially 1	1
•	3-5 years	2
<b>♦</b>	5 years	2
<b>•</b>	3 years minimum	1
<b>•</b>	2-3 years	1
<b>•</b>	2-5 years	1
<b>•</b>	3,4,5 optional	1
•	3 larger, 5 smaller	1

### 6a. Exit Ramps (13)

- ◆ Yes 13
- Only With M,A,D That Changed Group

### **6b. Trigger Events (14)**

•	Deviations From Norm or Peer Group	5
•	Mergers, Acquisitions or Divestitures; Difficulties	4
•	Unusual Events	4
•	High Earnings	2
•	Earnings Deviation	2
•	Liberal Exit Initially	1
•	Should Further Interests of Customers	1
•	M,A,D, Not Trigger nor High Earnings Unless Symmetrical. Bankruptcy or Insolvency Would	1

### **6c. Trigger Process (15)**

- ◆ All M,A,D 8
  - Not if P\* < P 1
- Automated Deviations
- ◆ Scheduled Review 1
- Voluntary
  - OEB/LDC
  - LDC
  - OEB 1
  - Intervenors

# 1a. Standard Metrics for Monopoly Service (16)

<b>*</b>	Safety	12
<b>♦</b>	Reliability	5
<b>*</b>	Call Response	9
•	Interruptions	
	<ul><li>Number</li><li>Min</li><li>Cust. Min</li></ul>	6 7 1
<b>*</b>	Customer Transfer Time	2
<b>*</b>	Installation Time	4
<b>*</b>	Customer Satisfaction	7
<b>*</b>	Environmental	1
•	Wires Charge	1

Meter Reading	2
<ul> <li>Emergency Response</li> </ul>	1
<ul> <li>Distribution System Integrity</li> </ul>	1
<ul> <li>Informative and Courteous PR</li> </ul>	1
<ul> <li>Public Safety Effort</li> </ul>	1
<ul> <li>Maintenance Costs/km</li> </ul>	1
<ul> <li>Controllable Costs</li> </ul>	2
<ul> <li>Average Cost Per Customer</li> </ul>	1
<ul> <li>Operating Efficiency</li> </ul>	1
<ul> <li>Financial/profitability</li> </ul>	3



### 1b. Specific Standards (9)

<b>♦</b>	Average of MEA Indices	1
<b>*</b>	Customer Transfers Within 3 to 6 Weeks	1
<b>*</b>	Survey of Public Attitudes	1
<b>*</b>	Days Lost Per Hours Worked	1
<b>*</b>	High Risk Injuries	1
<b>*</b>	Define Objectives of Standards	4
<b>*</b>	SAIDI	1
<b>*</b>	SAIFI	1
<b>*</b>	CAIDI	1

### 1c. Standards Differ by Class (II)

- ◆ Yes 8
- ◆ Core or some same 3
  - Customer satisfaction
  - Customer transfer time

#### 1d. Adoption (11)

◆ Phased-in	2
<ul><li>Negotiated</li></ul>	2
◆ Peer Group Historical Data	1
◆ 1999 Data	1
<ul> <li>Power Interruption Statistics</li> </ul>	1

Recognize Uncontrollable Factors 1

- Long Term Rolling Average

Use 5% Bandwidth Around Target

#### 1e. Rewards/penalties (12)

- ◆ Yes Rewards and Penalties 5
- ◆ No 1
- Nonperformance Penalties
- Performance Incentives
- Implications of WSHB Approach

#### 2a. distribution system losses by distributors (14)

- Cap for Each Utility Based on Group Trend (Some Losses Due to Transmission Const.)
- ◆ Figure Into Rates Geography and Load Density (e.g. at 3% Vendor Only Allowed to Retail 97% of Power Brought to LCD's Gate).
- System Losses As Separate Line on Bill Since Some Utilities Do Not Have Direct Control of System Losses.
- Allowable Max Cap on System Losses Based on Peer Group Average Loss Figure. Recover Through Distribution Charge
- ◆ Accounted for in Distribution Wires Charge With Transformer Ownership Allowances If Transformation Customer Supplied.
- Responsibility of LDC. Contained in Initial Revenue Requirement. Price Cap Scheme Will Incent Utility to Control Losses.

#### 2a. distribution system losses by distributors (14) (cont.)

- Uplift Charge Based on kWh Usage
- Distributor Assumes Responsibility for System Losses If Mechanism in Rate Process for Cost Recovery for Capital Invested in Load Reduction and Energy Efficiency
- Should Be Part of Wires Charge
- Recovered From All Customers of LDC Based on Historical Average
- Treat As Other Targets by Establishing Acceptable Range With Suitable Exceptions
- Apportioned to system users. Each customer charged proportional share of line losses and included in delivery cost
- Wire uplift cost to customer. Separate engineering losses from theft/unmetered energy
- Separate out losses not under utility's control before benchmarking

### 3a. Z Factors (18)

<ul><li>Yes</li></ul>	18

- Broad enough for all LDCs but same for all 1

#### 3b. Define Z Factors (19)

<ul> <li>Weather/Catastrophic</li> </ul>	11	◆ Equipment Failure	2
◆ Accounting/Tax Change	7	<ul><li>Safety</li></ul>	1
◆ Legislative/Regulatory	12	◆ Environmental	3
<ul> <li>Amalgamations/Structuring</li> </ul>	4	<ul><li>Litigation Costs</li></ul>	1
◆ Expansion	3	◆ Economic/Customer Loss	2
<ul><li>Capital Improvement</li></ul>	2	<ul> <li>Underground Cable</li> </ul>	1
◆ Process	1		
<ul> <li>Third Party Damage to Plant/Uninsured Losses</li> </ul>	2		



### 4. Form of Sharing (16)

<b>♦</b>	Yes	11
	- Deadband	3
	- Symmetrical	1
	<ul> <li>Favoring shareholders</li> </ul>	3
	<ul> <li>Favoring customers</li> </ul>	1
<b>*</b>	Depends on Plan Parameters/Circumstances	2
<b>*</b>	Not Necessary for Municipal Utilities	1
<b>*</b>	Utility Should Propose	2

### 5a. PBR Impacts on Competition (11)

•	Minimal Impacts	3
•	PBR Framework Should	6
	- Further competition	1
	<ul> <li>Minimize impacts</li> </ul>	1
	<ul> <li>Achieve level playing field</li> </ul>	2
	- Be comparable	2

### 5b. Achieve Symmetry (12)

Issue Is:

<ul> <li>Very complex</li> </ul>	1
- Not necessary	1
PBR Framework Should	10
- Be comparable	6
- Achieve level playing field	3
- Focus on cost and rewarding efficiency	1

### 1a. Implementation Date (16)

•	2000	2
<b>*</b>	2001	2
•	Immediately/asap	3
•	18 Months After Rules Established	1
•	With Restructuring	5
•	Phased	1
•	After Hydro Ceases Oversight	1
•	Within 1 Year of Incorporation - Consider interim regulatory procedures	1

#### 1b. Same Start Date (10)

- ◆ Yes 6
- Staggered by Peer Group2
- Likely Staggered Due to incorporation timing
- Option to Start When Services Unbundled

### 1c. Options for Late Filing or Implementation Delay (5)

<b>♦</b>	Yes	1
<b>♦</b>	No	2
	- Within first 2 years	1
	- If resource constrained	1
<b>*</b>	Private utilities need reasonable rules	
	to deal with unique issues	1

### 2a. Routine data collection (13)

<ul> <li>Necessary for OEB/PBR</li> </ul>	8
Routine Operational and Financial	2
◆ Data Provided to MEA	1
◆ Depends. Focus on Historical Trend	2
◆ Data to examine:	4
- Cost Allocation and Subsidization	1
- Reasonableness of Rates	1
<ul> <li>Nonperformance and Summary Financial Performance</li> </ul>	1
<ul> <li>Profits, Service Qs, Zs, Actual Inflation, and Productivity</li> </ul>	1

### 2b. Frequency of Data Collection (14)

◆ Annual	10
◆ Semi-Annual	1
<ul><li>For profits, quality, and Z</li><li>Rest annually</li></ul>	
◆ Quarterly	3
- All	1
- Some	1
<ul> <li>Initially for benchmarking: annual thereafter</li> </ul>	1

### 2c. Submissions Similar (10)

- ◆ Same 4
- ◆ Within Peer Group
- ◆ By Size or Circumstances 3

### 3a. Data Availability (14)

- ◆ MEA 7
- ◆ Yes 3
- ◆ No 1
- ◆ Difficulties 4

#### 3b. Timely data available (3)

- ◆ MEA 1
- Utility load density, rural/urban, OH/UG
- base cost, industry inflation, actual productivity

#### 4. Benchmarks (12)

<b>♦</b>	Consultative Process	1
<b>*</b>	Peer Group	4
<b>*</b>	Geography/size	7
<b>*</b>	Growth	1
<b>*</b>	Customer Profile/mix	3
<b>*</b>	Load Density	3
<b>*</b>	Urban/rural	11
<b>♦</b>	Underground	2

- Smaller Utilities Lack Data,
   Need Standard Format for Collection
- ◆ Voltage
- ◆ Plant Age
- Distribution System Design 1
- ◆ /Transformer Assets1