

## APPENDIX A - Written comments on October 16, 1998 PBR Issues List

### Stakeholder Comments on PBR Issues

#### IV. General

1a Given that approval of the PBR plans may not involve a hearing, how should interested parties provide input?

#### IV. General

	1	Miscellaneous
	Stakeholder Input into PBR Process	Comments
A	Establish a model(indices and processes), recieve input at MEA district meetings, revise model accordingly.	
B		
C	Utlity should be required to advertise PBR in its service area, with written submissions to the proponent and the OEB by certain date.	1. Electricity flow through utilities' system needs to be monitored by one organization to quantify losses and reduce unaccounted power. Difficult to coordinate if multiple parties in control of metering and billing. 2. If billing
D		
E	Upon licence renewal the utility would advertise that licence is expiring and that comments should be submitted directly to the OEB.	Utilities should have a flat cost of service charge and delivery charge similar to gas industry. Flat cost of service charge helps spread costs on a more equitable basis than consumption. Small residential consumers can cost the same to service as large .
F		
G	Setting of performance standard level should be done in multi-utility hearing process to reduce regulatory burden and enable participation of intervenors with expert	Unable to fully consider problems/benefits of PBR approaches without understanding of how OEB intends to fulfill its responsibility to facilitate energy efficiency and due to highly complex nature of the problem, without financial ability
H	Interested parties should be identified and a consultative process should be used to get their views on the PBR plan.	
I	PBR approval should be by application to OEB and not through hearing.	
J	Any regulatory scheme which is established without an initial hearing must make provisions for any party with an objection to be heard.	Responsibility for ensuring appropriate performance of a municipally owned utility naturally rests with the municipality. Supports the introduction of a performance based measurement system for electric utilities that is founded on a uniform system
K		Treatment of default supply, contributed capital policy
L		Contributed capital

## APPENDIX A - Written comments on October 16, 1998 PBR Issues List

M	OEB should have input mechanism that recognizes needs of interested parties to be informed and that requires response in a timely manner.	Contributed capital
N	Input, prior to the approval of a scheme could be obtained by the utility through: focus groups, customer advisory panels; utility solicited written comment to be addressed to the OEB. While plan in effect process to address customer concerns regarding the application of the plan.	Impact of rural and remote rate assistance on PBR schemes. Capital contribution policy. Terms and conditions of service. Capital structure. Consideration of internal and external benchmarks.
O		
P		Utility credit to worthy customers. Cost of bad debt if billing and collection is done by party other than utility.
Q		Identify what is going to be regulated. Performance should be published to enable each utility to strive to excellence, but local board should set the goal and knows the role and suffer the consequences.
R		Regulation of default supply.
S		
T	Each utility should be required to advertise that it is applying to the OEB for its rates. Interested parties should be advised to submit concerns/input to OEB and the utility by a stated date. OEB and utility will be required to respond to interested parties.	Bad debt recovery should be factored into Z factor or in the standard rate offering. Cross-subsidization between LDC and municipality.
U	Individual utilities should be able to provide direct input to the process.	