



**POWER
WORKERS'
UNION**

RECEIVED

DEC 30 2004

ONTARIO ENERGY BOARD December 28, 2004

Mr. John Zych
Board Secretary
Ontario Energy Board
Box 2319
26th Floor, 2300 Yonge Street
Toronto, ON M4P 1E4

Dear Mr. Zych: *To 30/12*

Re: RP-2004-0188 2006 Electricity Distribution Rate Handbook Development Process – Guidelines on Service Quality Indicators

The Power Workers' Union (PWU) represents members working for 40 different employers in all sectors of the electricity industry, including: Hydro One; 23 local distribution companies other than Hydro One; Ontario Power Generation; Bruce Power; TransAlta in Ottawa; Northwind Power; Mississagi Power; the Electrical Safety Authority; and the Independent Market Operator. In addition, the PWU is a limited partner in the Bruce Power Limited Partnership.

The PWU's 15,000 members are the customer interface across all sectors of the electricity industry who have direct responsibility for generating, transmitting and delivering power in a safe, efficient and reliable fashion. Any initiative or proceeding that impacts the industry's ability to provide value to customers in terms of safety, reliability and quality service is of fundamental concern to the PWU. Therefore, in representing employees in the electricity industry, the PWU also upholds the public interest, which it in part fulfills through participation in the Ontario Energy Board's (Board) regulatory initiatives and proceedings.

In forwarding its key concern on safety, reliability and quality of electricity service in the Board's RP-2004-0188 process, the PWU has raised the question of whether the Board would be including guidelines on Service Quality Indicators (SQI) on various occasions in the process starting with the Board's 2006 Electricity Distribution Rates Issues Conference (Issues Conference) held on September 3, 2004. The PWU has of necessity pursued the issue of SQI in this process given the existence of service quality guidelines in the Board's current version of the Electricity Distribution Rate Handbook and the absence of reference to SQI in Board Staff's "2006 Distribution Rates Discussion Paper for Issues Conference" prepared for the September 3, 2004 Issues Conference.

On Issues Day, November 1, 2004 Richard Stephenson of Paliare Roland, Counsel to PWU obtained confirmation from Ms. Lea that the current Chapter 7 on Service Quality would be included in the 2006 Electricity Distribution Rate Handbook and that any

CANADIAN UNION
OF PUBLIC EMPLOYEES,
LOCAL 1000, C.L.C.

244 EGLINTON AVE. E.
TORONTO, ONTARIO
M4P 1K2

TEL.: (416) 481-4491
FAX: (416) 481-7115

PRESIDENT
Don MacKinnon

VICE PRESIDENTS
Peter Falconer
Peter Kelly
Mel Hyatt



Printed on recycled
and recyclable paper

discussions on SQI would take place in the Comparators and Cohorts (C&C) Working Group. Ms. Lea also indicated that changes to the chapter were not necessarily anticipated.

The PWU participated on the Board's Service Quality Regulation (SQR) Working Group that met through late 2003 and early 2004 and that was abruptly ended with a "Cancellation/Postponement" e-mail from Board Staff to members of the working group. From our participation on that working group the PWU is aware that there are significant issues with the interpretation of the filing guidelines that accounts for substantial inconsistency in the SQI filings between the electricity distribution companies. To ensure consistency and robustness of the SQI filings the PWU submits that the SQI review process undertaken by the SQR Working Group needs to be completed and its recommendations implemented.

At the December 2, 2004 meeting of the C&C Working Group there was consensus that while revisions to the Service Quality chapter related to "errata" previously issued by the Board would be made, a review of the SQI guideline was out of scope for this working group. The PWU concurs that SQI is out of scope for the C&C Working Group but is concerned that the review of the SQI guidelines may be lost unless there is a formal process that will address the issue of ongoing safety, reliability and quality of electricity distribution service. While Board Staff indicated at the December 2, 2004 meeting that the Board might consider resurrecting the SQR Working Group to complete its review in the summer of 2005, the PWU is seeking a formal pronouncement by the Board on the Board's intent to complete the SQI review process.

Yours truly,

A handwritten signature in cursive script, appearing to read "Don MacKinnon", followed by a horizontal line extending to the right.

Don MacKinnon
President