

OEB Proposed Performance Scorecard

General Comments

The following comments are general in nature, have been gathered in a discussion with several CHEC LDCs, and are presented here for consideration by the Performance and Benchmarking Working Group.

Is the RRR Reporting for the items now on the Scorecard replaced by the Scorecard or does the Scorecard pick up the data from the RRR? The LDCs want to avoid duplication of information.

In the past LDCs have been advised not to worry about historical RRR errors but only correct the most recent years. If the data for 2007 is to be used for trending, the LDCS would like the opportunity to correct all previous years.

The Performance Outcomes related to Public Policy Responsiveness appears to take a fairly narrow view. For example, the LEAP program has put a significant burden on the systems and resources even though it represents a small sum of money. There may be other measures to be considered.

Arrears Management reporting and tracking – (disconnects, etc.)

The LDCs would like to see Safety on the Scorecard. Because of trending, accidents could cause spikes in costs.

There are other regulators that need to be considered where their regulations impact the performance of the LDC such as Construction 22/04 ESA which can impact utility Performance.

Employee satisfaction can have a significant impact on the performance categories and should be considered. Possible measures of employee retention, staffing levels, etc.

Dissatisfied employees = dissatisfied customers.

Specific Comments about the Measures

It is felt most of the measures already captured in the RRR should not burden the KLDCs with additional costs since the data is currently available from the RRR and from miscellaneous OEB audits.

Complaints by Consumers and Market Participants

- Definition of complaint is necessary
- What complaints are the LDCs accountable for? What are their areas of influence?
- No control over 80% of the bill
- Many complaints about the DRC/HST
- Many complaints about Retailers
- The LDC can respond to all written complaints but the complaints need to be categorized.
- There may be too much LDC discretion in determining what is a complaint.
- Can it be resolved
- Was the OEB notified?
- Response should drive change if LDC can control
- May not be a good measure if it can't be easily defined

Customer Survey Results

- Requires 3rd party to conduct survey
- Mixed feelings if the OEB conducts the survey – Cost and OEB developed questions
- Content has to be consistent
- Timing has to be appropriate, i.e. not immediately following rate changes, etc.
- Sample size is an issue for small/medium LDCs, i.e. may be a very low number of respondents
- Transactional surveys may have merit
- Tie the surveys into the other measures on the Scorecard
- Is the survey about the industry or about the services provided by the LDC?
- Must compare the cost to the benefit of the surveys
- Prior Town Hall meetings for CDM/Smart Metering for example had little or no attendees
- Can we look at the experience other industries have had with customer surveys?
- No support for surveys
- Put survey on LDC home website
- Provide incentives

OM&A Cost per Customer

- For the smaller and medium LDCs OM&A can be more volatile year to year vs larger LDCs
- This volatility makes it difficult to trend
- Recognition of the Low voltage and high voltage issue and whether those should be included in OM&A

- Suggest the OM&A and Net Plant per customer be combined onto one measure
- The description states facilitates cost comparisons between companies needs to be reviewed based on above comments
- Smart Meter costs moving from variance accounts distort OM&A costs across LDCs
- Separately identify remove spikes – normalize costs
- Consider OM&A Budget vs Actual

Net Plant Cost per Customer

- Suggest the OM&A and Net Plant per customer be combined onto one measure
- To ensure consistent reporting the quantification Net Plant Cost needs to be clearer. Where does Contributed Capital fit in or does it? Is it just the assets the LDC gets a return on?
- Where does this info come from?

Capital Budget vs. Actual

- LDCs should be provided with an envelope of spending and not held to specific projects
- Categorization of the fixed assets within the budget, job type such as Customer Demand, reliability, etc.

Peak Demand and Energy Savings Measures

- This information is provided by the OPA 8 to 9 months after the year end

Average Time to Connect

- Timing is dependent on the OPA and whether there is capacity available on the system
- What is the clear definition of a “Request”?
- What about things outside of the LDCs control?
- This data may be available from the OPA
- Did we meet the minimum requirement per the DSC. If so, why are we worried about averages?
- We don’t worry about averages when considering Connection of New Services.
- Is this measure appropriate and what is it attempting to measure
- All of the conditions required of the customer must be met before the clock starts ticking