



March 8, 2023

To: All Licensed Electricity Distributors  
All Other Interested Parties

Re: **2023 Annual Reporting and Record-keeping Requirements (RRR) and Updates to RRR Documentation – Electricity Distributors**

The Ontario Energy Board (OEB) is pleased to provide this summary of changes to the Reporting and Record-keeping Requirements (RRR) for licensed electricity distributors (Distributors). Aligned with the Minister's [letter of direction](#) on Red Tape Reduction and the [OEB's 2022-2025 Business plan](#) goal to evolve toward becoming a top-quartile regulator, these changes support modernizing the RRR to reduce regulatory burden and adapt to changes in the electricity sector.

For the April 2023 filing where entities will report for fiscal 2022, several changes have been implemented to streamline the RRR, enhance the RRR Filing Portal and account for new reporting requirements. To ensure RRR guidance is up to date, the OEB has also issued an updated Electricity Reporting and Record-keeping Requirements document ([Electricity RRR](#)), [RRR Filing Guide](#) for Electricity Distributors and [User Guide](#) for Web-based RRR Data Revision Requests.

This letter also highlights the following new RRR amendments which will be effective for future filings.

- For the April 2024 filing, a new RRR amendment related to net metering is being introduced for Distributors. This amendment will support the OEB in monitoring market activity related to third-party ownership of net-metered renewable energy generation.
- As communicated in recent [letters](#), the OEB has introduced RRR amendments for Distributors as part of the Reliability and Power Quality Review (RPQR) initiative which has changes effective for the April 2024 and April 2025 filings.
- As communicated in a recent [letter](#), the OEB has introduced RRR amendments for Distributors as part of the Distributed Energy Resources (DER) Connections Review which has changes effective for the April 2024 filing.

This letter also includes a reminder to Distributors with respect to their Publicly Traded Securities (PTS) reporting requirement.

The RRR forms are now available in the [RRR Filing Portal](#) and the deadline to submit is **May 1, 2023** in recognition of the April 30<sup>th</sup> due date falling on a weekend.

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In keeping with the expectation set out in the Minister's [letter of direction](#) on Red Tape Reduction, the OEB has continued its work on reviewing the RRR with an objective to right-size the requirements and make the filing system and processes more efficient. Along with refining some of the requirements, the OEB has also leveraged the internal RRR Stewardship Program to identify improvements which reduce the amount of time and level of effort needed to file the RRR data. Furthermore, the OEB launched the [RRR Consultation](#) in October 2022 to gather stakeholder feedback on the RRR and the filing processes, which has further guided the improvements pursued in this fiscal year. The first stakeholder meeting was held in November 2022 where attendees provided valuable input on RRR improvements which can help reduce regulatory burden. This feedback has also been leveraged by the OEB to identify focus areas for future improvements. Following the November 2022 meeting, stakeholders also indicated a strong interest in participating in regularly occurring meetings to continue the discussion on RRR improvements. With that in mind, the OEB is looking to incorporate annual stakeholder meetings as part of the RRR Consultation.

The RRR changes are summarized below and, in many cases, reflect direct feedback from Distributors.

## **Reductions to RRR and Enhancements to the Portal for April 2023 Filing**

### RRR Section 2.1.4.1 Reporting on Service Quality Requirements

Only the service quality metrics which do not meet the annual target set by the Distribution System Code (DSC) will now require monthly data to be reported. For all the service quality metrics where the annual target has been met, only annual data will need to be reported. This change aims to reduce reporting burden while allowing the OEB to continue to monitor metrics not meeting targets, and ensuring that Distributors continue to provide customer-focused services.

### RRR 2.1.16 LEAP Reporting

As previously communicated in a [letter](#) issued on March 2022, the OEB added a data field to capture the amount of supplemental funds added to the Low-income Energy Assistance Program (LEAP) in 2021 as a result of the cost assessment offset. The data

field “Supplement to LEAP from Cost Assessment Offset” has now been removed from the RRR Filing Portal as it was intended to be a one-time reporting requirement for 2021.

#### RRR 2.1.7 COVID Sub-accounts

The following sub-accounts under Account 1509 have been removed as they no longer require annual reporting through RRR filing:

- Sub-account Costs Associated with Billing and System Changes
- Sub-account Lost Revenues
- Sub-account Other Costs
- Sub-account Forgone Revenues from Postponing Rate Implementation
- Sub-account Bad Debt

The Account 1509 - Impacts Arising from the COVID-19 Emergency will remain in place.

#### Electricity Scorecard and Management Discussion & Analysis (MD&A) Approval

The process to merge the MD&A with the scorecards has been automated in the RRR Filing Portal. Previously once Distributors uploaded their MD&A, OEB staff manually merged the MD&A with the scorecards before making them available to Distributors for self-certification as per RRR 2.2.2. With this new enhancement, the MD&A will automatically merge with the scorecard as soon as Distributors upload it to the RRR Filing Portal without needing any intervention from OEB staff, making the process faster and more efficient.

#### Error Proofing and Auto-populating Data on Input

Upgrades were made to sections 2.1.4, 2.1.5, 2.1.8, 2.1.14 and 2.1.19 of the RRR Filing Portal to improve error notifications when data issues are detected and auto-populate cells where applicable. This includes notifications of suspected data errors upon exit of fields and improvement of error messaging to be more specific. The sections have also been updated to auto-populate cells to reduce the need to input the same data more than once. By ensuring that data for these sections is accurate before submission, these enhancements are expected to save OEB staff and Distributors time by minimizing the number of inquiries during the data validation process.

#### **Additions to RRR for the April 2023 Filing**

The following accounts have been added to the RRR Filing Portal for RRR 2.1.7 under Sub-accounts reporting. The RRR 2.1.7 CSV templates which can be found on the [OEB's RRR page](#) have been updated with the following sub-accounts to assist with filing this information:

### Designated Broadband Projects Sub-accounts

In a previous [letter](#), the OEB directed licensed, rate-regulated electricity distributors with any designated broadband projects in their service area to establish two new accounts. Accordingly, reporting of these accounts has been added to the RRR Filing Portal.

- Account 1508 - Other Regulatory Assets, Sub-account Designated Broadband Project Impacts
- Account 1508 - Other Regulatory Assets, Sub-account Designated Broadband Project Impacts, Carrying Charges

### Implementation of the Ultra-Low Overnight (ULO) Regulated Price Plan Sub-accounts

In a previous [letter](#), the OEB established a generic deferral account for distributors to track the revenue requirement impacts of their material costs of implementing the ULO option. Distributors can establish the following two new sub-accounts which came into effect on October 18, 2022, therefore reporting of these accounts has been added to the RRR Filing Portal.

- Account 1508 - Other Regulatory Assets, Sub-account ULO Implementation Costs
- Account 1508 - Other Regulatory Assets, Sub-account ULO Implementation Costs, Carrying Charges

## **Updates to RRR Documentation**

To assist Distributors with filing their RRR data, the OEB has updated the following document:

- [Electricity RRR](#)
- [RRR Filing Guide for Electricity Distributors](#)
- [User Guide for Web-based RRR Data Revision Requests](#).

These updates ensure that RRR-related documentation is up to date with reporting requirements and system changes. A summary of updates can be seen below.

### Electricity RRR

OEB staff have made changes to and issued an updated Electricity RRR. As this document was last updated in March 2020, many of the updates account for RRR changes that have previously been communicated and implemented.

- In a previous [letter](#), the OEB eliminated quarterly filings for RRR 2.1.2 and aligned the due date with all other annual RRRs. The Electricity RRR has been updated to reflect this and references to quarterly filings has been removed from Section 2 as Distributors no longer have quarterly filings.

- The Electricity RRR has been updated to reflect the change noted above for RRR 2.1.4.1 Service Quality Requirements.
- In a previous [letter](#), the OEB introduced new data points which were required to support the Activity and Program-based Benchmarking (APB) framework. Accordingly, RRR 2.1.5.8 Activity and Program-based Benchmarking has been added to the Electricity RRR.
- In a previous [letter](#), the OEB amended the RRRs to delete RRR 2.1.15 due to the revoking of Ontario Regulation (O. Reg.) 326/09. Accordingly, RRR 2.1.15 has been removed from the Electricity RRR.
- In a previous [letter](#), the OEB removed RRR 2.1.17 and RRR 2.1.18 after a review determined the sections were no longer required. Accordingly, RRR 2.1.17 and 2.1.18 have been removed from the Electricity RRR.

#### RRR Filing Guide for Electricity Distributors

OEB staff have issued an updated RRR Filing Guide for Electricity Distributors. This guide provides Distributors with guidance on improving the accuracy of RRR reporting and data quality assurance, based on OEB staff's findings from data quality reviews of past RRR filings. A summary of changes can be found in the guide on Page 5 – Summary of Changes to RRR Filing Guide.

#### User Guide for Web-based RRR Data Revision Requests

OEB staff have issued an updated User Guide for Web-based RRR Data Revision Requests. As this guide was last updated in 2016, the recent changes include new screenshots of the RRR Filing Portal, removal of outdated information and the addition of guidance on completing a data revision.

### **New RRR Changes for the April 2024 Filing and Beyond**

As the OEB continues to advance various initiatives, OEB staff aim to provide sufficient notice on future RRR changes. Below is a list of new RRR changes known to date which will be effective for 2023 fiscal year reporting and beyond. Distributors should refer to the specific letters for details.

#### New Electricity RRR Requirement related to Net Metering for April 2024 Reporting

The Electricity RRR will be amended in advance of the April 2024 filing specifically to address third-party ownership of net-metered renewable energy generation in Ontario (referred to as “third party net metering”). Aligned with the Minister's letter of direction, the amendments will support the OEB in monitoring market activity related to third party net metering.

On June 14, 2022, the OEB issued a [Notice of Amendments](#) to the Distribution System Code, Electricity Retailer Code of Conduct, and Retail Settlement Code (collectively, Codes) to ensure the Codes are consistent with and facilitate the implementation of changes to O. Reg. 541/05 (Net Metering), made under the *Ontario Energy Board Act, 1998*, and O. Reg. 389/10 (General) made under the *Energy Consumer Protection Act, 2010* that came into force on July 1, 2022.

The amendments to the Codes ensure appropriate consumer protections are in place. Among these is the requirement that a distributor receive a signed document from customers who wish to participate in third party net metering that includes the customer's declaration that certain information has been disclosed to them pursuant to 7.(1)(f) of the Net Metering regulation (see [Schedule G](#) of the net metering forms).

The OEB intends to amend the Electricity RRR such that distributors will be required to report the number of signed declarations received pursuant to 7.(1)(f) of the Net Metering regulation (together with the related total installed capacity).

Distributors will be expected to report this data in the April 2024 filing.

#### RPQR RRR Amendments

In recent [letters](#), the OEB introduced amendments to the Electricity RRR to support improved reliability reporting as part of its RPQR initiative. The letters note RRR amendments which will come into effect for the April 2024 and April 2025 filing.

#### DER Connections Review RRR Amendments

In a recent [letter](#), the OEB introduced changes to the Electricity RRR to provide insight into the progress of Ontario's energy transition as part of its ongoing DER Connections Review. These RRR amendments will come into effect immediately, with the first reporting required in April 2024.

#### **Publicly Traded Securities (RRR 2.1.20 & 2.1.21)**

This is a reminder that Distributors must submit their Publicly Traded Securities (PTS) report in Excel format to the [OEBs Secure File Transfer Protocol \(SFTP\) server](#). All Distributors will receive an email in the coming weeks with the PTS Excel form along with filing instructions.

The [RRR Filing Portal](#) is now open for submissions by Distributors and the deadline to complete their RRR submissions is **May 1, 2023**.

Any questions relating to this letter should be directed to [performance\\_reporting@oeb.ca](mailto:performance_reporting@oeb.ca).

Yours truly,

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