



Ontario
Energy
Board | Commission
de l'énergie
de l'Ontario

BY EMAIL AND WEB POSTING

January 23, 2020

To: All Licensed Electricity Distributors
All Other Interested Parties

**Re: New RRR Filing System Go-Live
Amendments to Reporting and Record-keeping Requirements (RRR)
Major Event Response Reporting Improvements**

The Ontario Energy Board (OEB) is implementing an improved Reporting and Record-keeping Requirements (RRR) system on **January 27, 2020**. Licensed electricity distributors will be required to use the new system for their quarterly RRR filings due February 28, 2020. The OEB is also taking this opportunity to make a change to the RRRs to simplify reporting by distributors about major events that affect their customers. This letter provides more details regarding both of these changes.

New RRR Filing System Go-Live

On November 13, 2019, the OEB announced it was introducing a new RRR filing system called Pivotal UX designed to improve the RRR filing process by making data submission easier for distributors. The system was made available to volunteers for testing which concluded on December 20, 2019. Nineteen distributors volunteered to try out the new system and provided feedback. The OEB appreciates the time and effort spent by distributors testing the system and values the feedback received. Overall feedback from users was positive and encouraging about the user experience with the new system. Distributors provided a number of suggestions for improvements to the system, which have been assessed and prioritized by staff based on when the RRR forms they relate to are due to be submitted by distributors.

Improvements that will be implemented by January 27, 2020, include changes to the formatting and display of RRR submission pages, as well the system will now only show the most recent version of the RRR form submitted to ensure clarity of data on record.

A further set of suggested improvements will be implemented by February 28, 2020. These improvements are largely beneficial to the annual filing forms due to the number of forms affected. They include providing the ability to download & print all current and historical filings, improving consistency of number formatting, making data validation rules more robust to help prevent RRR filing errors, and fixing issues found with the CSV upload process including providing better process guidance to users.

Some of the suggested improvements were determined to be significant system changes with longer lead times to implement due to the nature of changes, including sufficient testing. We intend to include these suggested improvements as part of an overall plan for Pivotal UX improvements that will be done in conjunction with the OEB's planned broader RRR review.

As noted above, Pivotal UX will go live on **January 27, 2020** for all electric distributors. After this date the e-Filing Services system will no longer be accessible and all RRR submissions, including Major Event reporting (see below) will need to be done in Pivotal UX. To complete the Q4 RRR reporting due **February 28, 2020**, please access Pivotal UX via the [RRR Filing webpage](#).

Major Event Response Reporting Improvements

On May 3, 2016, the OEB implemented amendments to the RRR that introduced major event reporting by distributors, including a definition of a major event and major event response reporting (MERR) requirements. A key element of the MERR is a questionnaire that distributors must submit within 60 days of a major event. The OEB's expectation for the MERR questionnaire was that it would provide insight into each event and into the distributor's restoration efforts in relation to those events.

As of September 2019, 154 MERRs have been submitted to the OEB. OEB staff has undertaken a detailed assessment of all the MERR questionnaires filed by distributors and has observed that the interpretation of many of the MERR questions vary between distributors as does the amount of information provided. This lack of consistency reduces the value of the information from distributors' responses as it is difficult to fully understand the circumstances of the major event and the distributor's restoration efforts. The inconsistency in distributor MERR evaluations and limited insights into their restoration efforts significantly impacts the value to the OEB in assessing distributors' efforts in terms of addressing major events and the overall assessment of reliability, which can affect the reporting on reliability in Scorecards. To address this issue OEB staff reached out to a group of distributors with proposed improvements to the MERR questionnaire. Based on the comments and feedback received from those distributors, the OEB has prepared a revised MERR questionnaire (see Appendix A).

The improvements include reduced overlap between questions and added clarity to ensure consistency in distributors' reporting on major events and overall reliability measures. Below is a high level summary of the changes made which will help to ensure that the reliability metrics provide value to the sector and customers:

- Removed and/or combined questions which can lead to similar responses
- Improved wording to increase clarity and thus consistency in responses
- Removed questions that, based on staff's review of submitted MERR reports were not providing sufficient value for the distributor's effort
- Improved formatting of the response fields to increase consistency between distributors in their responses

Updates to [RRR](#) section 2.1.4.2.10 have been made to reflect the improvements to the Major Event Response Reporting.

User support on filling out the new MERR forms in Pivotal UX can be found on page 86 of the [RRR Filing Guide](#).

Any questions should be directed to IndustryRelations@oeb.ca, or by phone at 1-877-632-2727.

Yours truly,

Original signed by

Brian Hewson
Vice President, Consumer Protection & Industry Performance

Attachment A: Updated Major Event Response Reporting

Attachment A: Updated Major Event Response Reporting

January 24, 2020

2.1.4.2.10 Major Event Response Reporting

Please note that, except Loss of Supply events, a Major Event **shall meet all** of the criteria listed under the **first, second and fourth paragraph** of the Major Event definition written under section 2.1.4.2 of the [Electricity Reporting and Record Keeping Requirements \(RRR\)](#).

Prior to the Major Event

1. Did the distributor have any prior warning that the Major Event would occur?
 Yes No Additional Comments: _____

2. If the distributor did have prior warning, did the distributor arrange to have extra employees on duty or on standby prior to the Major Event beginning?
 Yes No
 Brief description of arrangements, or explain why extra employees were not arranged: _____

3. If the distributor did have prior warning, did the distributor issue any media announcements to the public warning of possible outages resulting from the pending Major Event?
 Yes No

4. Did the distributor train its staff on the response plans to prepare for this type of Major Event?
 Yes No

During the Major Event

1. Please identify the main contributing Cause of the Major Event as per the table in section 2.1.4.2.5 of the Electricity Reporting and Record Keeping Requirements.
 - Loss of Supply
 - Lightning
 - Adverse Weather-Wind
 - Adverse Weather-Snow
 - Adverse Weather-Freezing rain/Ice storm
 - Adverse Environment-Fire

- Adverse Environment-Flooding
- Other

Please provide a brief description of the event (i.e. what happened?). If selected "Other", please explain: _____

2. Was the IEEE Standard 1366 used to derive the threshold for the Major Event?

- Yes, used IEEE Standard 1366*
 - No, used IEEE Standard 1366 2-day rolling average
 - No, used fixed percentage (i.e., 10% of customers affected)
- *The OEB preferred option

3. When did the Major Event begin (date and time)?

4. Did the distributor issue any information about this Major Event, such as estimated times of restoration, to the public during the Major Event?

- Yes
- No

If yes, please provide a brief description of the information. If no, please explain:

5. How many customers were interrupted during the Major Event?

_____ Customers

What percentage of the distributor's total customer base did the interrupted customers represent?

_____ %

6. How many hours did it take to restore 90% of the customers who were interrupted?

_____ Hours. Additional Comments: _____

7. Were there any outages associated with Loss of Supply during the Major Event?

- Yes
- No

If yes, please report on the duration and frequency of the Loss of Supply outages: _____

8. In responding to the Major Event, did the distributor utilize assistance through a third party mutual assistance agreement with other utilities?

- Yes
- No
- Do not have third party mutual assistance agreements with other utilities

If yes, please provide the name of the utilities who provided the assistance?

9. Did the distributor run out of any needed equipment or materials during the Major Event?

- Yes No

If yes, please describe the shortages: _____

After the Major Event

1. What actions, if any, will be taken to be prepared for, or mitigate, such Major Events in the future?

- No further action is required at this time
- Additional staff training
- Process improvements
- System upgrades
- Other

Additional Comments: _____