



**Ontario Energy Board**

**Commission de l'énergie de l'Ontario**

## OEB COST ALLOCATION REVIEW

### **Division of Demand-Related Costs:**

Bulk v Primary v Secondary – Implementation Update

April 25th, 2005  
John Vrantsidis

# Why Issue Important

Staff Discussion Paper proposed voltage adjustment (primary vs secondary) when allocating demand-related costs

- intent: those who demonstrably use less of distribution system should be allocated less

Some stakeholders have commented proceeding with this breakout should be a key objective of the forthcoming studies



# Engineering Questions

- Assets could be built for one purpose (e.g. subtransmission), but use changes over time (e.g. to primary)
- Some assets could have dual purposes
- Some stakeholders believe distribution systems can operate on integrated basis



# Data Availability Questions

- Present USoA does **not** track costs on voltage- differentiated basis
- Therefore some type of estimates required if this concept to be implemented in forthcoming filings



# “Bulk” Distribution

Phase 2 Workshop proposed “functional” approach towards defining:

- that is, should look at how assets used

Also suggested more useful to use terminology “bulk power”



# “Functional” approach to “Bulk”?

Functional approach tries to identify situations where the distribution system delivers power in bulk

Any complete definition must answer:

- i) All Large Users? (if so, why)
- ii) All Embedded LDCs? (counter examples mentioned)
- iii) Any others (larger GS customers?) – who and why

But NO agreement emerged in Working Group when attempted to define



# Voltage-Based Approach to “Bulk”?

- To try introducing greater certainty to definition, working group has returned to examining a voltage-based approach
- many on working group agree such an approach can promote cost causality
- but some believe may lead to unfair results in certain situations



# Concluding Questions re “Bulk”?

- Q1) Is it practical to implement the concept at this time?
- Q2) Should a common definition be adopted, or should each LDC use its own expert judgement?
- Q3) Would a functional or voltage-based approach be most useful as a common default?
- Q4) Should LDCs be allowed flexibility to adopt an alternative approach? Can circumstances be defined where an alternative approach would better suit the utility’s circumstances?



# Definition “Secondary”

- Agreement voltage-based definition satisfactory
  - 750 V will be boundary



# Definition “Primary”

- Previous discussions proposed definition of primary to be treated as residual after secondary and subtransmission are defined
- Will be further discussed in the Working Group



# Modeling Issues: Key Definitions

Draft model has tentatively incorporated bulk vs primary vs secondary subdivision  
(see handout I4)

- Model will reflect final decision



# Modeling Issues: Level of Guidance

Working Group currently creating high-level template

- some LDCs have also requested detailed guidance on how to implement any breakout or estimates required



# Stakeholder Comments:

Advisory Team has discussed issue at length and following will share their views:

## Tuesday April 25th

- Jane Scott (Ottawa Hydro)
- Wayne Clark (AMPCO)

## Thursday April 27<sup>th</sup>

- Bob Mason (representing a number of LDCs)
- Bill Harper (VECC)

