

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*;  
AND IN THE MATTER OF an Application by Hydro One Networks Inc.  
for an Order or Orders including an exemption  
from sections 7.5.1 and 7.5.2 of the Distribution System Code

**SUMMARY OF APPLICATION**

1. The Applicant is Hydro One Networks Inc. (“Hydro One”), a subsidiary of Hydro One Inc. Hydro One is an Ontario corporation carrying on the business, among other things, of owning and operating distribution facilities in Ontario.
2. Hydro One requests that the Ontario Energy Board (“the Board”) grant an exemption from section 7.5.2 of the Distribution System Code (“the Code”) as it applies to section 7.5.1. Section 7.5.1 directs distributors’ obligations respecting missed and re-scheduled appointments with customers. Section 7.5.2 requires that these obligations be met 100 per cent of the time on a yearly basis. Hydro One requests that the Board grant, on a permanent basis, an exemption from the 100 per cent requirement and instead, direct Hydro One to meet these requirements 90 per cent of the time on a yearly basis.
3. Hydro One also requests that the Board grant to Hydro One an immediate, interim stay of the obligations specified in sections 7.5.1 and 7.5.2 of the Code, as of the date of this Application, until such time as the Board renders a final decision on this matter.
4. While requesting an alternative obligation of 90 per cent, Hydro One will nonetheless continue its best efforts to fulfill these requirements 100 per cent of the time, as calculated on a yearly basis.

The details of this Application are set out below.

## **OVERVIEW**

On average, Hydro One staff arrange between 20,000 and 25,000 appointments with customers annually. These appointments may be scheduled for purposes such as the need to discuss a layout for new or upgraded electrical service, locate underground cable or to provide a Hydro One employee entry in order to read or service an inaccessible meter. Given the breadth of Hydro One's service territory, such customer visits often require staff to travel some distance through portions of the Province which are not only very rural and very sparsely populated, but which also present certain communication challenges. These conditions can affect the Company's ability to meet its obligations as a distributor, pursuant to the Code.

### **Code Requirements**

Sections 7.5.1 and 7.5.2 of the Code address the distributor's time-based obligation to contact the customer when a scheduled appointment is expected to be missed or has been missed. More specifically:

- if the appointment is expected to be missed, the distributor must attempt to inform the customer beforehand (s. 7.5.1 (a)) and
- whether the customer was informed ahead of time or not, the distributor must attempt to re-schedule the appointment within one business day (s. 7.5.1 (b)).

These two requirements must be met 100 per cent of the time on a yearly basis (s. 7.5.2).

The relevant sections of the Code are reproduced in Attachment A.

### **HYDRO ONE'S COMPLIANCE STATUS**

As seen in Table 1 below, Hydro One has been non-compliant with these sections of the Code, as it has been unable to consistently meet its obligations 100 per cent of the time, although it did attain 98 per cent in each of 2010 and 2012.

**Table 1.**  
**Distribution System Code 7.5.2, Re-scheduling a Missed Appointment**  
**Hydro One's Historical Record**

		<b>Actuals</b>			
OEB Requirement 100%	Year	2010	2011	2012	2013
		%	<b>98</b>	<b>79</b>	<b>98</b>

In 2013, the Company's capability to quickly make and re-schedule appointments was compromised with the newly installed Customer Information System. Despite training on the system, clerical errors in scheduling and re-scheduling of appointments occurred, which decreased the success rate of meeting the required time frame and resulted in a correspondingly lower percentage of re-scheduled appointments within 24 hours.

## **HYDRO ONE'S EFFORTS TO COMPLY**

### **Hydro One's Current Processes**

Today, if a Hydro One field employee knows that he or she will be unable to keep an appointment, the process is to contact the appropriate field office to call the customer, inform them that Hydro One is unable to keep the appointment and re-schedule to another date and time. On other occasions, such as during a storm, the field office, knowing that resources will be re-prioritized to restoration efforts, will proactively contact customers to re-schedule planned work with them at a later date.

There are times, however, when a customer cannot be informed prior to a missed appointment, for reasons such as the following:

- In some areas, communication challenges, such as limited cell phone coverage, may hinder the employee's timely communications with Hydro One field office staff, who would then contact the customer.

- In more rural areas, unforeseen difficulties such as a vehicle breakdown resulting in the employee's preoccupation with trying to safely move his or her vehicle to a secure area, can limit the employee's ability to contact the field office in a timely fashion.
- Similarly, unexpected emergencies, such as employees falling ill while on the road and having to go to hospital, or stopping to help with accidents or other incidents, can take them away from their main purpose and prevent timely contact with the field office.

Once an appointment has been missed, the field office will contact the customer and re-schedule the appointment within the required time frame. On occasion, however, Hydro One's capability to re-schedule a missed appointment within 24 hours may be compromised by extreme emergencies, such as a major storm or tornado, which will require the complete focus of all field and clerical staff while restoration efforts are in effect.

For all the above-noted reasons, Hydro One believes that, while it will make best efforts, it will not be fully compliant with section 7.5.2 of the Code, as the 100 per cent requirement does not reflect the issues presented by unforeseen or emergent circumstances, such as the diversion of crews to storm restoration, or the practical realities of scheduling employees who must travel long distances between individual appointments. A compliance requirement that is less than 100 per cent (such as the requested target of 90 per cent) would allow Hydro One the flexibility needed in these cases.

### **Hydro One's Future Processes**

Hydro One recognizes the importance of keeping customers informed when customer appointments cannot be met, and of re-scheduling missed appointments in a timely fashion. Ongoing training will continue to be provided. The Company also has established a new process by which the field offices will report regularly on failures and processing of adjustments (clerical keying errors) which will heighten the awareness and importance of appointments and timely re-scheduling of appointments.

In short, Hydro One is increasing its efforts to meet the Section 7.5.1 obligations 100 per cent of the time. However, in light of the continuing issues stated above, the Company requests that the requirement imposed by the Board reflect an accomplishment of 90 per cent, rather than 100 per cent of the time on an annual basis. Hydro One believes that this is a reasonable obligation which mirrors other, very similar time-based obligations, such as those required for sections 7.3 (Appointment Scheduling) and 7.4 (Appointments Met) in the Code.

### **REQUEST FOR EXEMPTION**

For the reasons cited above, Hydro One seeks the following exemptions from the Code, by way of Board Order(s) or licence condition(s) or any other vehicle that the Board may deem appropriate:

- An immediate and interim stay of the obligations of sections 7.5.1 and 7.5.2 of the Code, from the date of filing of this Application, to remain in effect while the Board considers the merits of this Application.
- A permanent exemption from the time-based obligation (100 per cent of the time) in section 7.5.2 of the Code as it applies to the requirements of section 7.5.1. Hydro One requests instead, that the Board direct that the Company meet its customer contact and appointment re-scheduling requirements at least 90 per cent of the time on a yearly basis.

While requesting a stated obligation of 90 per cent, Hydro One will nonetheless make best efforts to meet its obligations 100 per cent of the time on an annual basis, as stated in section 7.5.2 of the Code.

**ATTACHMENT A**  
**RELEVANT EXCERPTS FROM THE DISTRIBUTION SYSTEM CODE**  
**(SECTIONS 7.5.1 AND 7.5.2)**

**7.5 Rescheduling a Missed Appointment**

7.5.1 When an appointment to which sections 7.3.1, 7.3.3, or 7.4.1 apply is missed or is going to be missed, the distributor must:

- (a) attempt to contact the customer before the scheduled appointment to inform the customer that the appointment will be missed; and
- (b) attempt to contact the customer within one business day to reschedule the appointment.

7.5.2 This service quality requirement must be met 100 percent of the time on a yearly basis.