

**INTERROGATORIES OF
THE SMART SUB-METERING WORKING GROUP
(Round Three)**

**Toronto Hydro Electric System Limited
2011 Rates Application**

EB-2010-0142

February 25, 2011

**Interrogatories of the Smart Sub-metering Working Group (“SSMWG”)
(Round Three)
to Toronto Hydro Electric System Limited (“THESL”)**

Reference: Exhibit L1, Tab 4, Schedule 1: *Cost of Service Study for Individually Metered Suites in Multi-Unit Residential Buildings – Alternate Scenario Ordered by the Ontario Energy Board, BDR, February 18, 2011 (the “Study”)*

1. Of the 48 buildings identified in the further Study as containing units with Quadlogic suite meters in 2009, what proportion were retrofit buildings (i.e. conversions)?
2. What proportion of the retrofit buildings with Quadlogic suite meters are served through secondary infrastructure?
3. Of the 9,149 customers identified as being Quadlogic customers for the purposes of the further Study, what number of these customers are retrofits (i.e., conversions from older metering systems as opposed to new buildings)?
4. Of the 20 buildings identified for which there is “relatively complete data”, what number of these 20 buildings were retrofits (i.e. conversions)?
5. Subsection 4.6.2 of the further Study indicates that a figure of \$440 was applied as the meter capital allocator to each of 9,149 members of the sub-group. Please advise of the actual costs to install Quadlogic meters in each of the buildings which were the subject of conversions which are included in the 9,149 customer sub-group. Please confirm that the cost to convert existing buildings is greater than the cost to install Quadlogic meters in new construction. Please provide on a per unit basis the average cost for retrofit installations.
6. Please identify each of the specific accounts set out in Table 4.4 where BDR has done the following:
 - (a) decreased the allocation to the Quadlogic customers relative to either or both of the residential suite metered sub-group and the residential non-suite metered customers;
 - (b) increased the allocation to the Quadlogic customers relative to either or both of the residential suite metered sub-group and the residential non-suite metered customers;
 - (c) Please confirm that all remaining accounts not identified in (a) and (b) above have been allocated solely on the basis of the allocator normally used in the OEB’s cost allocation model (e.g., demand, customer count, etc.);
 - (d) For each of the accounts identified in (a) and (b) above, please set out specifically the value of the change (in dollars and percentages) and the justifications for the change.

7. It appears that THESL has for purposes of the further Study removed from the Quadlogic customer sub-group some of the secondary infrastructure costs that would, in accordance with standard cost allocation methodology, be allocated to the sub-group. The SSMWG does not accept that the removal of some of these costs is appropriate and therefore requests THESL provide versions of Tables 4.4 and 5.1 that appear in the further Study showing the costs if the standard allocators that are used to allocate secondary costs (e.g., KW) to all classes are also used to allocate costs to each of the three residential sub-classes set out in those tables. The SSMWG does not require a further study, just the updated tables. Directly allocable costs to acquire, install, maintain and service and read (and any other directly allocable activities) the Quadlogic meters which serve only the Quadlogic sub-group would still be directly allocated in this scenario.