

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, (Schedule B);

AND IN THE MATTER OF a Notice of Intention to Make an Order for Compliance against Toronto Hydro-Electric System Limited.

**SUBMISSIONS OF SMART SUB-METERING
WORKING GROUP IN RESPONSE TO
TORONTO HYDRO MOTION**

1. The Amended Notice of Motion from Toronto Hydro-Electric System Limited (“Toronto Hydro”) seeks disclosure of a wide range of documents from members of the Smart Sub-metering Working Group¹ (the “SSMWG”). In particular, Toronto Hydro asks the Ontario Energy Board (the “OEB”, or the “Board”) to order each member of the SSMWG to produce all proposals to and contracts with any condominium developer for the installation and operation of sub-meters in condominiums in the City of Toronto. Toronto Hydro makes an additional disclosure demand from Enbridge Electric Connections Inc. (“EECI”), which is discussed at the end of these submissions.
2. This is a compliance proceeding, where Ontario Energy Board (“OEB” or “Board”) Compliance Staff is seeking certain remedies and sanctions against Toronto Hydro. The OEB’s Notice only references two projects; it does not address Toronto Hydro’s conduct in respect of any other projects.
3. The SSMWG is not the subject of the proceeding. It is not a party. Its participation in the proceeding is limited to making submissions on what sanctions against Toronto

¹ The Smart Sub-metering Working Group is made up of the following members:

Carma Industries Inc.
Enbridge Electric Connections Inc.
Hydro Connection Inc.
Intellimeter Canada Inc.
Provident Energy Management Inc.
Stratacon Inc.
Wyse Meter Solutions

Hydro are appropriate, in the event that there is a finding of non-compliance against Toronto Hydro.

Toronto Hydro's Disclosure Demand against SSMWG Members

4. While the SSMWG leaves it to OEB Compliance Counsel to address the issues related to disclosure of documents and information in the OEB's possession, the SSMWG strongly objects to the demand for disclosure from SSMWG members.
5. It ought not to be equated with a demand for disclosure from a complainant whose own situation is the subject of the proceeding, as Toronto Hydro does in its Amended Notice of Motion when it relies on cases like *Ontario Human Rights Commission v. Dofasco* to justify disclosure from non-parties.
6. The OEB's *Rules of Practice and Procedure* do not provide for disclosure orders against non-parties. That supports the view that such a step is extraordinary. This is underlined by the fact that Toronto Hydro does not cite any case where the OEB has required disclosure from a true non-party. The two cases cited by Toronto Hydro involved disclosure being ordered from (i) an applicant (Hydro One, in EB-2007-0930); and (ii) a party whose decision was being appealed to the OEB (the IESO, in EB-2007-0040).
7. The SSMWG submits that disclosure from non-parties should only be ordered where the documents sought are clearly relevant, and there will be no prejudice or undue burden on the non-parties resulting from the disclosure. In this regard, the SSMWG believes that it is important to emphasize that it is the conduct of Toronto Hydro, not the SSMWG members, that is the subject of the Board's Notice and this Compliance Proceeding. Toronto Hydro's disclosure demand seeks to reverse that.
8. Paragraphs 20 to 22 of Toronto Hydro's Amended Notice of Motion sets out the reasons why Toronto Hydro asserts that the SSMWG disclosure is required. Briefly, Toronto Hydro asserts that its practice with respect to suite metering of new condominiums is justified because it prevents the "unauthorized mark up of distribution costs" by condominium developers or their agents and that this justifies refusing to connect such customers (because, if connected, they will contravene the laws of Ontario). Toronto

Hydro further asserts that it “seeks information on the financial arrangements between condominium developers and sub-meterers so that it can address whether either or both of these are seeking to unlawfully profit from distribution activities”.

9. Toronto Hydro’s explanation of the basis for its disclosure demand to the SSMWG makes clear that the documents sought are not relevant. Instead, Toronto Hydro seeks to obtain these documents so that it can turn this hearing into an examination of the business practices of members of the SSMWG. That is not proper. If there are issues with the way that members of the SSMWG conduct their business (which is denied), then the proper way to proceed is by way of separate complaint and compliance proceeding.
10. This proceeding is about actions that Toronto Hydro has already undertaken in respect of two particular projects. In that light, any defence that Toronto Hydro makes must be based on the state of affairs as existed at the time that it refused to connect the Avonshire and Metrogate projects. If one were to accept that Toronto Hydro’s refusal to connect those projects was based on the defence as explained above, then one would expect that Toronto Hydro already has documentation in its possession that makes it absolutely clear that the condominium developers for those projects were somehow acting illegally. One would also expect that Toronto Hydro would have made the basis for its refusal (illegal conduct) clear to the developers at the time of the refusal. In that context, there should be no need to get disclosure from other parties, many months after the events in question took place.
11. Moreover, it certainly cannot be said that documents from other members of the SSMWG which relate to totally separate projects are in any way relevant to a defence that Toronto Hydro might make in respect of the Avonshire and/or Metrogate projects. Stated differently, even if Toronto Hydro now obtained disclosure of documents related to a different project and a different member of the SSMWG which established some sort of illegal conduct (which the SSMWG strongly denies), that would not provide a defence to Toronto Hydro’s conduct in respect of the Metrogate and Avonshire projects.
12. Toronto Hydro’s position in this compliance proceeding should be seen for what it is – a further attempt to overcome its previous unsuccessful attempts to prevent commercial

smart sub-metering in Ontario. If it had evidence of illegal conduct by a smart sub-metering company, it undoubtedly would have been produced to justify its policy. Instead, Toronto Hydro is trying to cast doubt, once again, on the business practices and reputation of members of the SSMWG. It is noteworthy that Toronto Hydro has not requested production from all licensed smart sub-metering companies, several of which are affiliates of electric local distribution companies ("LDC") or are under retainer by local distribution companies, like Toronto Hydro, to install smart sub-metering systems on the LDC's behalf.

13. Prior to the Government of Ontario enacting O. Reg. 442/07 under the *Electricity Act, 1998*, "Installation of Smart Meters and Smart Sub-metering Systems in Condominiums", and O. Reg. 443/07 under the *Ontario Energy Board Act, 1998*, "Licensing Sub-metering Activities", which came into force on December 31, 2007, the Ministry of Energy (as it then was) subjected the draft regulations to "extensive public consultations over 2006 and early 2007, which included posting of draft regulations on the [Minister of Energy's] Website for public comment and receiving significant feedback from a wide range of stakeholders."² Briefly, the submission of The Coalition of Large Distributors ("CLD"), which included Toronto Hydro, submitted that smart sub-metering was not in the public interest in part because Toronto Hydro and the balance of the CLD believed that sub-metering companies would need to be regulated in respect of rates, status, and capital expenditures.³
14. The recommendations by Toronto Hydro and the CLD were considered and were apparently rejected by the Ministry of Energy. The Regulations in their current form were issued, and smart sub-metering companies have been licensed and have invested millions of dollars into smart sub-metering infrastructure.
15. The stated policy of the Ministry of Energy and Infrastructure, as worded on its Website as of September 16, 2009, reads as follows:

² Ministry of Energy and Infrastructure Website, See attached, Tab 2

³ CLD Submission dated November 7, 2006, p. 3, Tab 1

“Smart Meters in Condominiums

Smart metering and smart sub-metering in condominiums is part of the government’s smart metering plan. ...

Licensing Sub-Metering Activities

- *To enhance consumer protection, and ensure appropriate safeguards are in place, this regulation requires commercial sub-metering entities that provide condominiums with smart meters, smart sub-meters, and any associated services to be licensed by the Ontario Energy Board.”⁴*

16. Toronto Hydro again attempted to influence the regulatory process in the submission it made jointly with four other utilities in respect of the Board’s development of the Smart Sub-metering Code of Conduct (“SSM Code”). Toronto Hydro submitted that the Board should require as a provision in the SSM Code an audit requirement in respect of smart sub-metering providers.⁵ The Board, in its Notice of Revised Proposal to Amend a Code and Notice of Revised Proposal to Issue a New Code, dated June 10, 2008, in response to the submissions of LDCs, like Toronto Hydro, stated the following:

“The Board will set out rules to protect the interests of consumers that are within its jurisdiction. In the proposed SSM Code, the Board has included customer protection measures similar to those provided to customers of licensed distributors regarding disconnection, security deposits and the consumer complaint process. Otherwise, the Board has applied requirements similar to the other area of competition in the electricity sector – the retailing of the commodity.”

17. The Board has a consumer complaint process. The Board would undoubtedly, upon receipt of a complaint, investigate the matter. If it determined that there was a non-compliance with a code or regulation, the Board would initiate a compliance proceeding against the party being the subject of the complaint, not every exempt distributor and licensed smart sub-metering provider as Toronto Hydro seeks to do in this proceeding.
18. Here, the defence being asserted by Toronto Hydro would effectively self-appoint Toronto Hydro as the regulator of the smart sub-metering industry. Toronto Hydro is

⁴ See Tab 2, pp. 4, 5

⁵ Submission by Toronto Hydro, PowerStream Inc., Hydro Ottawa, Horizon Utilities and Veridian Connections Inc., dated January 31, 2008

asserting that it is appropriate and necessary for it to examine the relationships between condominium developers/corporations and smart sub-metering providers to make sure that all legal and regulatory obligations are met, before agreeing to connect such customers. This cannot be right, particularly given Toronto Hydro's publicly-stated antipathy for smart sub-metering. It is submitted that developers, condominium corporations, members of the SSMWG and consumers that wish to be smart sub-metered would have little confidence that Toronto Hydro, an entity with a vested interest in saying no to smart sub-metering, would conduct itself objectively and impartially. If customers, or even Toronto Hydro, have concerns, then the proper way to proceed is by way of complaint and dialogue with the OEB, who is the proper regulator of such matters.

19. Finally, the scope of Toronto Hydro's disclosure demand makes clear that this is little more than a "fishing expedition". Toronto Hydro demands all proposals and contracts from all members of the SSMWG, related to any project in the City of Toronto. Toronto Hydro offers no evidence to support its demand. Other than a bare assertion that these documents are necessary so that Toronto Hydro "can address whether either or both of [developers or smart sub-metering providers] are seeking to illegally profit from distribution activities", no basis is given for requiring disclosure of what could amount to hundreds or thousands of documents.
20. In all of these circumstances, the SSMWG submits that the Board should dismiss Toronto Hydro's disclosure demand for documentation from the SSMWG.

Toronto Hydro's Additional Disclosure Demand against EECI

21. Toronto Hydro's Amended Notice of Motion also seeks to compel EECI to produce "all communications" with condominium developers, as well as other smart sub-meterers, addressing the terms on which it provides sub-metering to condominium developers in the City of Toronto, including information about "fees paid" to condominium developers in the City of Toronto.
22. In making this demand, Toronto Hydro refers to EECI as a "Complainant", based on correspondence from OEB Compliance Staff. Toronto Hydro has not produced this

correspondence, so it is not clear what is contained therein. What is clear, though, is that the OEB's Notice does not relate to any EECI projects. EECI was not the smart sub-metering entity which Metrogate and Avonshire intended to retain to install a smart sub-metering system. The OEB's Notice therefore does not relate to EECI projects. Therefore, any documents that EECI might have in its possession do not relate to the projects at issue in this proceeding.

23. In support of its disclosure demand of EECI, Toronto Hydro's argument in support of its disclosure demand of EECI is the same as that made in support of disclosure from all members of the SSMWG (found at paragraphs 20 to 23 of its Amended Notice of Motion). For the same reasons set out above, in response to that argument, the SSMWG submits that the Board should dismiss Toronto Hydro's disclosure demand for documentation from EECI.

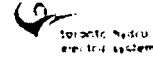
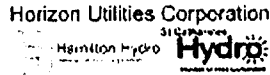
ALL OF WHICH IS RESPECTFULLY SUBMITTED

"Dennis O'Leary"

Dennis M. O'Leary
Counsel to SSMWG

2009-09-22
EB-2009-0308
SSMWG

TAB 1



November 17, 2006

Ministry of Energy
900 Bay Street, 4th Floor
Hearst Block
Toronto, Ontario
M7A 2E1

Honourable Dwight Duncan

Re: Smart Sub-Meters in Condominiums

The Coalition of Large Distributors ("CLD") appreciates the opportunity to comment on the Ministry's two proposed Ontario Regulations to be made under the *Electricity Act, 1998* and the *Ontario Energy Board Act, 1998*, entitled:

- Installation of Smart Meters and Smart Sub-Metering Systems in Condominiums; and
- Licensing Sub-Metering Activities

Background

Historically, many local distribution companies offered bulk-metering installations consistent with the technology available at the time. Individual meter installations were costly and cumbersome and occupied considerable space for which building owners had alternate uses. With little incentive for conservation and stable energy prices, landlords sometimes measured electricity used by units downstream from the distributor's revenue meter (the master meter) and apportioned the bill among the tenants. However, increased levels and volatility of energy prices have led to a greater demand for individual metering installations. Landlords and building owners no longer wish to build the price of electricity into the rent or condominium fees charged to tenants. Recent initiatives to create a conservation culture in Ontario have induced demand for more sophisticated individual meters that can measure time-of-use. Many distribution companies are making individual metering installations a standard offer as part of their conditions of service.

Multi-unit metering offers the potential for significant CDM savings to accrue to consumers with the installation of individual unit metering. U.S. studies have demonstrated a potential for significant load reduction. This program can directly contribute to the achievement of Government conservation objectives.

The CLD would assume that the goals of the Government with relation to smart metering condominiums include:

- Consistency with its overall Smart Metering agenda
- Maximization of CDM, and
- The development of a policy that balances the public interest and does not undermine the financial viability of the electricity distribution industry.

Proposed Regulation

The CLD understands the draft regulations, condominium corporations must install by December 15, 2010 either **a)** smart meters and their associated systems (e.g. ability to push data to the MDM/R etc) or **b)** a sub-metering system and their associated systems.

If a condominium corporation opts for **a)** above, the meters will be owned and operated by LDCs in accordance with our licenses, rates and the regulations that are now in place (re Ontario Regulation 417/06 procurement, Ontario Regulation 425/06 specifications and Ontario Regulation 426/06 cost recovery). If condominium corporation opts for **b)** above the condominium corporation will have to own and operate the sub-metering systems itself or sub-contract it out to a sub-metering company. The sub-meters will not necessarily have to "push and retrieve the data" to the MDM/R but will have to be able to record hourly data and time of use data. The condominium corporation or its sub-contracted sub metering company will require an operating licence from the Board and will have to comply with any codes or licence developed by the Board. The condominium corporation (or its sub-contracted sub metering company) will also have to comply with Ontario Regulation 161/99 that states that this distributor cannot charge more than reasonable costs.

Is the provision of sub-metering by non-utility entities in the public interest?

The CLD understands that the Ministry of Energy views sub-metering as a contestable activity. However, the CLD would submit that the potential for competitive benefits from such a proposal is very limited, principally because once connected, customers will not be contestable; that is, customers will not be able to switch electricity distributors in the way that they can switch cellular telephone carriers. Because new sub-metering entities would have monopoly power, they would need to be regulated by the Ontario Energy Board.

- Regulation of this added layer in the electricity distribution industry would not be restricted to rates, but would of necessity include other areas such as CDM programs, reliability, and customer service and so on.
- Given the unique nature of sub-metering entities, new rates would need to be developed and calibrated. In particular, it would not be appropriate to allow sub-metering companies to charge rates similar to distributing utilities.
- There is substantial risk of structural instability in the industry as various entities seek to enter the bidding process for the purpose of "carving out" specific customers. Incumbent utilities will likely be obligated to create affiliates in order to "compete" with sub-metering entities. Affiliates might seek opportunities to bid for "sweet spots" in the service territories of other utilities. Distributor rate cases will be further complicated by affiliate relationship issues.
- Allowing entry of sub-metering companies will also require that a default supplier be established to ensure the "less desirable" buildings will have individual meters. (Alternatively, one could create an exemption for the "less desirable" condominiums – a process which itself could be complex.)
- Even existing groupings of customers such as residential condominiums already connected to a distributor could demand similar treatment and the opportunity to secede and enter into an agreement with a sub-meterer. Moreover, structural instability, through its impact on expected cash flows, may actually hinder further rationalization in the industry, which continues to be a policy goal of the Province of Ontario.

- Uncertainty about customer base could have a detrimental impact on capital planning and the investment process.
- Instability of customer base will increase revenue uncertainty. This combined with a likely increase in regulatory uncertainty could have a detrimental impact on credit ratings and borrowing costs and further LDC rationalization and consolidation.
- As indicated above, there would be a substantial increase in regulatory burden and increased role for the compliance office at the OEB. A number of matters would need to be determined, such as who deals with customer disputes; how does the Board ensure that the public interest is served; and, who (if anyone) would review contracts?
- Introduce a further risk to LDCs to be able to effectively and efficiently plan their smart meter and CDM programs. Many programs have assumed individual suite metering to be consistent with the government's desire to have individual suite metering – yet an LDC cannot be certain that the condominium owner will seek their metering from the LDC and not from a sub-metering company.

As we have indicated, sub-metering companies would need to be regulated and licensed by the OEB in some fashion. Sub-metering affiliates of existing utilities may also require regulation. The increase in regulatory burden and the associated costs would arise for a variety of reasons, not all of them foreseeable:

- there could be many applications for sub-meterer status and rates;
- there may be many more entities to regulate;
- complex locational tariffs could emerge;
- capital expenditures may require increased regulatory scrutiny;
- there are likely to be disputes over "predatory behavior" which would need to be adjudicated.

Recommended solution

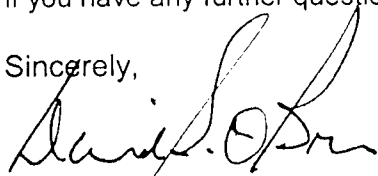
The CLD would submit that the Government can still achieve its objectives with respect to smart metering and CDM without the introduction of another layer of regulated entities by:

- Requiring condominium corporations to install smart meters in condominiums.
- Asking the Ontario Energy Board to review the need for a new rate class for individually metered condominiums.
- The costs of such contracts would be subject to the same type and level of scrutiny as any other contracting out activity during a rate application process. This could be achieved by way of a Code amendment and/or a licensing amendment. This would avoid the need to issue new licenses. The proposed approach would provide pricing and service consistency across service territories.
- Incentive regulation will promote consistent pricing, and improve LDC efficiency while maintaining safety, reliability and service levels.

In seeking out efficiencies through incentive regulation, LDCs will have the incentives to look to sub-contractors if the latter provides improved economic efficiency and service to customers.

If you have any further questions, please do not hesitate to contact the undersigned.

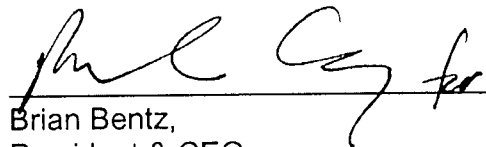
Sincerely,



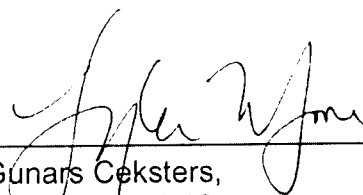
David S. O'Brien,
President & CEO
Toronto Hydro Corporation



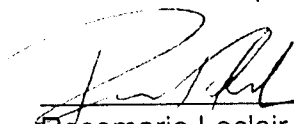
Max Cananzi,
President & CEO
Horizon Utilities Corp.



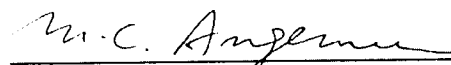
Brian Bentz,
President & CEO
PowerStream Inc.



per: Gunars Ceksters,
President & CEO
Enersource Corporation



Rosemarie Leclair,
President & CEO
Hydro Ottawa Limited



Michael Angemeer,
President & CEO
Veridian Corporation

2009-09-22
EB-2009-0308
SSMWG

TAB 2



MINISTRY OF ENERGY AND INFRASTRUCTURE

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ELECTRICITY

Smart Meters

To create a conservation culture in Ontario and become a leader in energy efficiency, the government is facilitating a number of key initiatives:

- introducing flexible, time-of-use pricing for electricity;
- committing to install a smart electricity meter in all Ontario homes and small businesses by the end of 2010 and
- introducing legislation to enable implementation of the government's smart metering initiative and conservation targets.

Smart Meters
<ul style="list-style-type: none"> • Introduction • FAQs • Net Metering Electricity • Regulations
Documents
<ul style="list-style-type: none"> ☒ AMI Specification Version 2 ☒ IESO Backgrounder, July 2006

The smart metering system includes an Advanced Metering Infrastructure (AMI) and Meter Data Management and (Meter Data Repository MDM/R) functions. An AMI is the infrastructure within which date- and time-stamped hourly meter reads will be remotely collected and transmitted daily to a utility's control computer and, eventually, to a centralized MDM/R.

The MDM/R will provide a common infrastructure for receiving meter reads from all AMI in Ontario, process the reads to produce billing quality consumption data, store and manage data, and provide access to such data to interested parties. *The Energy Conservation Responsibility Act, 2006*, sets out the broad purposes and objectives for MDM/R.

Smart meters are different from net meters. You can obtain more information about net meters in the Renewable Energy section of this website.

Advanced Metering Infrastructure (AMI)

As part of the government's smart metering initiative, the Ministry of Energy engaged a Technical Advisor to lead the development of high-

level specification for AMI. The specification was posted on the Ministry's website for a two-week period in late November 2005 to solicit comments from interested parties. The Ministry also held six public consultations sessions across Ontario on the draft specifications. In total, 184 participants representing 45 different entities attended. During the consultations, many questions were raised and helpful feedback was provided. Revisions to the draft high-level specification were made as a result of this consultation process as well as feedback received during the first wave of AMI procurement.

Meter Data Management / Repository (MDM/R)

To further the government's smart metering initiative, the Ministry of Energy posted draft specifications for the MDM/R functions to solicit feedback. Interested parties were invited to send written submissions for a three-week period ending June 30, 2006. The Ministry appreciates the level of detail provided in the responses received. Public consultation sessions on the draft specifications were also held during June 2006 and a great deal of feedback was received. In all, over 75 people attended the four sessions; their participation is appreciated.

[Click here to read the feedback received through the consultations.](#)

Smart Meters in Condominiums

Smart metering and smart sub-metering in condominiums is part of the government's smart metering plan.

To enable smart metering and smart sub-metering in condominiums, the following two Ontario Regulations were made under the *Electricity Act, 1998* and the *Ontario Energy Board Act, 1998*, and are entitled:

- Installation of Smart Meters and Smart Sub-Metering Systems in Condominiums; and
- Licensing Sub-Metering Activities

Installation of Smart Meters and Smart Sub-Metering Systems in Condominiums

- If a condominium's board of directors wishes to proceed, this regulation facilitates the voluntary installation of smart meters and smart sub-meters in condominiums without requiring an amendment to the condominium's declaration.
- This regulation also provides the Ontario Energy Board with the

authority to set criteria or requirements for metering technology used in condominiums and to ensure that the technology is capable of measuring electricity consumption or use in accordance with time of use rates and minimally is capable of measuring electricity consumption or use in hourly intervals.

- This regulation applies to both existing condominiums and condominiums under development.

Licensing Sub-Metering Activities


- To enhance consumer protection, and ensure appropriate safeguards are in place, this regulation requires commercial sub-metering entities that provide condominiums with smart meters, smart sub-meters, and any associated services to be licensed by the Ontario Energy Board.

The regulations are available on our [Electricity Regulations page](#).

These regulations were a product of extensive public consultations over 2006 and early 2007 which included posting of draft regulations [on this web-site](#) for public comment and receiving significant feedback from a

wide range of stakeholders. [Please click here to view these comments.](#)

Criteria and Requirements for Meters and Metering Equipment, Systems and Technology

- O. Reg. 425/06 (Criteria and Requirements for Meters and Metering Equipment, Systems and Technology) made under the *Electricity Act, 1998*, as amended to implement a change to the AMI specification..
- The existing Functional Specification for an Advanced Metering Infrastructure dated July 14, 2006 has been amended to remove the requirement that potential AMI providers have 5,000 units deployed in the field. The new version is [AMI Specification Version 2](#) 
- This will ensure that the next round of AMI procurement is able to access the latest technologies that have received approvals since last summer.
- Distributors still have the obligation to ensure that any AMI procured is able to reliably comply with the AMI functional specifications. Requirements to be able to connect to the MDMR remain in place.

For copies of the amending regulations and the revised AMI functional specifications, please see our [Electricity Regulations](#) page

Smart Meters: Cost Recovery

- There are two new regulations amending O. Reg. 426/06 (Smart Meters: Cost Recovery) made under the *Ontario Energy Board Act, 1998*.
- The amendments make it clear that distributors can recover costs, subject to Ontario Energy Board approval, for Smart Metering Entity enrolment and connection requirements – in essence plugging into the MDM/R.
- Secondly the amendments provide clarity around recoverability of costs associated with conventional meters that are replaced as a result of the smart metering initiative.
- Finally, the amendments clarify that the first five distributors integrated with the Smart Metering Entity's MDM/R system will be able to recover costs, subject to Ontario Energy Board approval, relating to supporting the IESO's finalization of the design and


requirements of the MDM/R.

The regulations are available on our [Electricity Regulations page](#)

In August 2006, the Ministry introduced regulations pertaining to smart metering that identify authorized metering activities, prescribe procurement principles that must be followed by distributors, govern the recovery of distributors costs relating to smart metering, and identify priority installations. The regulations are available on our [Electricity Regulations page](#).

IESO Smart Metering System Implementation Program

The Ministry of Energy has entered into an arrangement with the Independent Electricity System Operator (IESO) whereby the IESO will support the government's Smart Metering Initiative by coordinating and project-managing implementation activities. The IESO's Smart Metering System Implementation Program specifically pertains to the delivery of the MDM/R functionality, including all interfaces between the MDM/R and local distribution companies' AMI and customer information systems. The Background document describes the responsibilities of the IESO, Ministry of Energy, local distribution companies, and the overall project

governance model. [Click here to read the Background.](#) 

Be sure to monitor the IESO's website pertaining to this work at www.smi-ieso.ca

The Ministry expanded the IESO's objects to provide it with the authority to support the government's smart metering initiative as contemplated in the Background. This regulation is available for download on our [Electricity Regulations page](#).