

BY COURIER

January 14, 2011

Ms. Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street Suite 2700 P.O. Box 2319 Toronto, ON M4P 1E4

Dear Ms. Walli:

RE: Canadian Niagara Power Inc., on behalf of Grimsby Power Inc., Westario

Power Inc., and Algoma Power Inc. – Application for an Exemption from

Mandated Time-of-Use Pricing Date Board File Number EB-2010-0307

Please find accompanying this letter, two paper copies of Canadian Niagara Power Inc.'s responses to Board Staff interrogatories. Electronic copies of these responses have been submitted via the Board's Regulatory Electronic Submission System.

Yours truly,

Original Signed By

Douglas R. Bradbury Director, Regulatory Affairs

c. Andrew J. Sasso, ENWIN Utilities

Enclosures

FortisOntario Utilities EB-2010-0307 Responses to Board Staff Interrogatories Application for Exemption Mandated TOU Filed: January 14, 2011 Page 1 of 6

INTERROGATORY #1:

Preamble

Canadian Niagara Power Inc. ("CNPI") – Fort Erie, CNPI – Port Colborne, CNPI – Gananoque, Algoma Power Inc., Grimsby Power Inc., and Westario Power Inc. (collectively the "FortisOntario Utilities") are requesting an exemption from their mandatory TOU dates due to an upgrade of their common customer information billing system hosted by CNPI and an upgrade to their smart meter software system. CNPI Port Colborne and Fort Erie wish to be exempt from their current TOU date of December 2011 and are requesting a new date of January 2012. CNPI Gananoque is not requesting a new date. Grimsby Power Inc. and Westario Power Inc. wish to be exempt from their September 2011 TOU date and are requesting a new TOU date of December 2011. Algoma Power Inc. has requested an exemption from their June 2011 TOU date and is seeking a new date of June 2012.

- a) For each of the FortisOntario Utilities, please confirm the current status of the smart meter deployment and TOU implementation, including its progress on the ten milestones reported on each month.
- b) Please describe in detail the factors that the FortisOntario Utilities considered in making this application.
- c) Please identify the dates, and the number of RPP consumers on each date, by which each FortisOntario Utility will begin billing its RPP consumers on a TOU basis, if the requests for new mandatory TOU dates are granted.
- d) Please explain why the FortisOntario Utilities have not yet submitted project plans with the Smart Metering Entity confirming dates for enrolment testing.
- e) Please describe in detail FortisOntario Utilities' plan for enrolling with the MDM/R (Meter Data Management and Repository).

RESPONSE:

a) For each of the named utilities, Canadian Niagara Power Inc. ("CNPI") – Fort Erie, CNPI – Port Colborne, CNPI – Gananoque, Algoma Power Inc., Grimsby Power Inc., and Westario Power Inc. (collectively the "Applicants"), Appendix A contains a copy of each Applicant's latest monthly report to the OEB on Smart Meter/TOU progress to December 31, 2010. Each Applicant confirms the information in its report.

FortisOntario Utilities EB-2010-0307 Responses to Board Staff Interrogatories

Application for Exemption Mandated TOU Filed: January 14, 2011

Page 2 of 6

b) The critical factor that the Applicants considered in making this application was

the time requirement to implement the CIS (SAP) upgrade and develop MDM/R

communication and TOU billing capabilities in the CIS. The Applicants

considered whether the timelines for the above could be compressed to meet the

OEB-mandated dates for TOU rate implementation, but decided that rushing

these processes for such a major undertaking would not be a prudent approach.

The Applicants preferred to undertake a systematic, coordinated approach to

implementing the upgrade and TOU billing. The Applicants consider the slight

variance between the OEB-mandated dates and the Applicants' requested dates

to be reasonable.

c) Appendix B contains an updated version of the spreadsheet submitted to the

OEB by each of the Applicants in July 2010, identifying the dates and numbers of

RPP consumers on each date by which TOU billing will commence. The dates

have been updated to align with the Applicants' requested dates for TOU billing.

d) A common project plan has been submitted to the IESO for Canadian Niagara

Power Inc., Grimsby Power Inc. and Westario Power Inc. On December 21,

2010, each of these utilities received from the IESO confirmation of its enrolment

testing date.

The project plan did not include activities for Algoma Power Inc ("API"), because

some specific details of information technology ("IT") integration projects at API,

including smart meter data processes, are still being developed. A project plan

for API will be submitted to the IESO by March 1, 2011. Because of the timelines

involved in the IT integration projects for API, submitting the plan at an earlier

date would not have improved the TOU billing date for API.

e) The Applicants assume that the question pertains to activities in preparation for

enrolment testing with the Smart Meter Entity ("SME"). Key milestones in the

Applicants' project plan are as follows (completion dates for each activity shown):

Business Process review and documentation:

March 1, 2011

FortisOntario Utilities EB-2010-0307 Responses to Board Staff Interrogatories Application for Exemption Mandated TOU Filed: January 14, 2011 Page 3 of 6

CIS upgrade:	March 1, 2011
AS2 client implementation:	April 1, 2011
CIS configuration for SME connectivity and TOU billing:	June 1, 2011
Unit Testing – GPI:	Aug 12, 2011
Unit Testing – WPI:	Aug. 15, 2011
Unit Testing – CNPI:	Sept. 1, 2011
Self-Certification for enrolment testing – GPI:	Aug. 16, 2011
Self-Certification for enrolment testing – WPI:	Aug. 23, 2011
Self-Certification for enrolment testing – CNPI:	Sept. 7, 2011
CIS (SAP) implementation at API:	Jan. 1, 2012
Unit Testing – API:	April 1, 2012
Self-Certification for enrolment testing – API:	April 8, 2012

FortisOntario Utilities EB-2010-0307

Responses to Board Staff Interrogatories Application for Exemption Mandated TOU Filed: January 14, 2011

Page 4 of 6

INTERROGATORY #2:

<u>Preamble</u>

The FortisOntario Utilities state in their application that they have requested "an exemption from the OEB-mandated TOU implementation dates because of the need to first undertake an upgrade to their CIS systems."

- a) Please describe in detail the events, including timelines, which occurred since the FortisOntario Utilities submitted their baseline plans to the Board that are causing the FortisOntario Utilities to request a change to their mandatory TOU dates.
- b) Please describe in detail the consequences of the delays on the costs of the FortisOntario Utilities Smart Meter and TOU implementation plan.
- c) Are there any other factors (internal and/or external) the FortisOntario Utilities have identified that may hinder its ability to comply with their requested mandatory TOU dates?

RESPONSE:

a) SAP is a core technology of CNPI and is used extensively throughout the organization. SAP was initially implemented in 1999, with extended maintenance on the current version ending as scheduled on December 31, 2010.

In 2007, CNPI conducted an internal review of alternative technical solutions including the vendor proposed upgrade of SAP in 2010. These were considered to ensure prudence and timing of further technology investments.

In 2008, an SAP upgrade analysis was conducted to review various technical alternatives with respect to carrying out an upgrade of CNPI's SAP customer information and enterprise resource planning systems. The decision in 2008 was to maintain the status quo until the end of support period. At that time, CNPI noted that it would review its decision regarding the upgrade with a view of possibly carrying out the upgrade in 2010/2011. This plan is consistent with that outlined by CNPI in its 2009 rate applications (EB-2008-0222, EB-2008-0223, EB-2008-0224).

FortisOntario Utilities EB-2010-0307 Responses to Board Staff Interrogatories Application for Exemption Mandated TOU Filed: January 14, 2011 Page 5 of 6

In 2010, CNPI reviewed the analysis and the decision was made in June to carry out the technical upgrade from the current version (R/3 release 4.6C) to the upgraded version of SAP (ECC 6.0). In particular, CNPI recognized the risks associated with fixing and maintaining an out-of-date technology, and determined that it was prudent to carry out the upgrade.

With the advent of Smart Meter deployment and TOU rate implementation, CNPI originally considered using its existing version of SAP to implement MDM/R connectivity and TOU rates. When the original TOU baselines were submitted to the Board in July 2009, this was still the intent of CNPI. However, subsequent to this during the timeframe between October 2009 and January 2010, as CNPI personnel attended information sessions hosted by the IESO and Util-Assist, they learned more about the technical requirements and processes involved in achieving MDM/R connectivity and TOU rates. CNPI also engaged in discussions with SAP consultants regarding the optimal method of configuring the CIS to achieve Smart Meter Entity ("SME") connectivity and TOU billing. It became evident that a great deal of customization work would be required to adapt the existing version of SAP for the purpose of TOU rate implementation. Because the newer version of SAP contains modules that facilitate TOU billing, any customization work on the existing system, and its associated costs, would all become redundant once the SAP upgrade was implemented.

Bearing in mind the fact that the SAP upgrade would possibly be required in the near future anyway, in February 2010 CNPI decided to explore advancing the SAP upgrade so that SME connectivity and TOU billing could be implemented with the upgraded system. Between February 2010 and May 2010 a scoping exercise was carried out to determine required costs and labour resources and to develop a framework for the technical requirements. In June 2010, the project to proceed with the SAP upgrade was formally approved. Between June and August 2010, CNPI developed detailed technical requirements for the upgrade and engaged in project planning, including internal and external resource identification and allocation. The upgrade project formally kicked off in September 2010.

FortisOntario Utilities EB-2010-0307 Responses to Board Staff Interrogatories

Application for Exemption Mandated TOU Filed: January 14, 2011

Page 6 of 6

As a result of the timelines involved in executing the SAP upgrade and configuring the CIS to achieve SME connectivity and TOU billing, the Applicants are requesting an extension to the Board-mandated dates for TOU billing.

- b) The requested delays will have no material impact on costs for the Applicants' Smart Meter and TOU implementation plan.
- c) While the Applicants are confident that the requested dates are achievable, there are factors that could hinder its ability to comply with the requested TOU dates; namely:
 - Internal factors such as unforeseen delays due to technical issues in the SAP upgrade, CIS configuration for TOU billing, or SME connectivity.
 - External factors and technical issues with IESO IT systems, such as pending upgrades to their system.
 - External factors and communication issues with the AMI networks, which are operated by the AMI vendors.
 - Further regulatory changes with respect to TOU and Smart Meters.

FortisOntario Utilities EB-2010-0307 Responses to Board Staff Interrogatories Application for Exemption Mandated TOU Filed: January 14, 2011

Appendix A

Summary							
Distributor Name							
Canadian Niagara Power Inc.			·				
For the Period From	For the Period To		First Submitted On				
December 1, 2010	December 31, 20	10	January 7, 2011				
Submitter Name	Status		Due Date				
Mary Tibollo	Submitted		January 10, 2011				
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January 11, 2011	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1						
PP Eligible Consumers:							
Description		Residential Class	General Service Less Than 50kW Class	Total			
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Number of smart meters installed in	n the period	20	19	39			
Number of smart meters registered period	I with the MDM/R in the	0	0				
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Total cumulative number of smart the MDM/R at the end of the period		0	0				
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Percentage of RPP-eligible con	sumers with smart me	ters installed at	the end of the period				
Residential Class	General Service 50kW Class	e Less Than	Total				
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Percentage of total smart mete		nistered with the	A Samura and A Sam	riod			
Residential Class	General Service 50kW Class	-	Total				
0.00	0.00	0.00					
Percentage of total RPP-eligible		arged TOLL price					
Residential Class	General Servic 50kW Class	-	Total				
0.00	0.00		0.00				

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Residential Class	General Servic 50kW Class	e Less Than	Total .							
98.70	68.30		95.70							
Percentage of total smart meters	s installed that are re	gistered with the	MDM/R at the end of the per	riod						
Residential Class	General Servic 50kW Class		Total							
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PP Eligible Consumers:				
Description		Residential Class	General Service Less Than 50kW Class	Total
Total Number of RPP-eligible consu	mers	3,100	396	3,49
Number of smart meters installed in		12	21	
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Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion
10. Transition to Production Operations			January 1, 2012	
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for Enrolment To (Note: This mus week prior to the start date)		Original Sc		ed		Stati	us	Ex Da	•	ed Comple	tion	Actu Date	al Completio

Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
8. Qualification Testing (QT)			April 30, 2012	
Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
9. Self Certification - Cutover	<b>#</b>		March 31, 2012	
Activity	Original Scheduled Completion Date	Status	Expected Completi	on Actual Completion Date
10. Transition to Production Operation	s		June 30, 2012	
dditional Comments	and Information			
Additional Comme	nts			
				[8] A.
		***************************************		
	rm that the information containe ose Yes to submit this filing. Otl		•	
* Submit Form				
No				

Summary		
Distributor Name		
Grimsby Power Incorporated		
For the Period From	For the Period To	First Submitted On
December 1, 2010	December 31, 2010	January 7, 2011
Submitter Name	Status	Due Date
Mioara Domokos	Submitted	January 10, 2011
RRR Filing No	Report Version	Edit Date
111	0	January 7, 2011 2:32 PM
Expiry Date		
January 11, 2011		

## RPP Eligible Consumers:

Description	Residential Class	General Service Less Than 50kW Class	Total
Total Number of RPP-eligible consumers	9,379	662	10,041
Number of smart meters installed in the period	20	0	20
Number of smart meters registered with the MDM/R in the period	0	0	0
Number of RPP consumers being charged TOU prices added in the period	0	0	0
Total cumulative number of smart meters installed in the service area at the end of the period	9,355	467	9,822
Total cumulative number of smart meters registered with the MDM/R at the end of the period	0	.0	o
Total cumulative number of consumers being charged TOU prices at the end of the period	0	0	0

Percentages (Calculated on Save	apolario em carrollar e el montro a presentado e recentar alquese como estra reculsión tecesario. A	
Percentage of RPP-eligible co	nsumers with smart meters installed at t	he end of the period
Residential Class	General Service Less Than 50kW Class	Total
99.70	70.50	97.80
Percentage of total smart met	ers installed that are registered with the I	MDM/R at the end of the period
Residential Class	General Service Less Than 50kW Class	Total
0.00		0.00
Percentage of total RPP-eligib	le consumers being charged TOU prices	s at the end of the period
Residential Class	General Service Less Than 50kW Class	Total
0.00	0.00	0.00

# Progress Report on SME Milestones

(ACTIVITY	Original Scheduled Completion Date	N. C. OTTIC		Actual Completion Date
AMCC Internal     Testing			February 1, 2011	

Activity	Original Scheduled Completion Date	Statue	Expected Completion Date	Actual Completion Date
2. CIS Internal Testing		-	June 1, 2011	

	in the second control of the second control	tin kalabanda serik terberah di beranja berangan kelambi berandak di berangan berangan kelambi kelambi kelambi Beranda	н өөрүүн байдаган байдаг мейгийдүү дүйтүй бийтүү түрөө байдаган ба
Activity	Yes or No?	Expected Completion Date	Actual Completion Date
MDM/R Registration Application submitted	***************************************	September 10, 2010	

Activity		Expected Completion Date	Actual Completion Date
4. Enrolment Wave requested and confirmed (Note: the SME will either confirm the requested start date or suggest an alternate)	,	October 15, 2010	December 21, 2010

Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
5. Unit Testing			August 1, 2011	

Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
6. Submitted a completed Self Certification for Enrolment Testing SME_FORM_0007 (Note: This must be submitted at least one week prior to the confirmed enrolment wave start date)			August 15, 2011	

Activity	Original Scheduled Completion Date	Status		Actual Completion Date
7. System IntegrationTesting (SIT)			September 1, 2011	i i i i i i i i i i i i i i i i i i i

: ACTIVITY	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
8. Qualification Testing (QT)		**************************************	October 1, 2011	

ACTIVITY	Original Scheduled Completion Date	Statile	Expected Completion Date	Actual Completion Date
Self Certification - Cutover		300000000000000000000000000000000000000	November 1, 2011	

Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
10. Transition to Production Operations			December 1, 2011	

## **Additional Comments and Information**

-	Additional Comments		
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Declaration: I confirm that the information contained in this report is true, accurate, and complete. IMPORTANT: Choose Yes to submit this filing. Otherwise the form will be saved but not submitted.

* Submit Form
No

Westario Power Inc. SME Milestones to be provided later.

FortisOntario Utilities EB-2010-0307 Responses to Board Staff Interrogatories Application for Exemption Mandated TOU Filed: January 14, 2011

# **Appendix B**

Distributor Name (Please enter your Company name below)	Route	Rate Class	Date of First TOU Bill Sent/to be Sent (enter in date format dd/mm/yy - like 23/06/10)	Number of Customers Received/Receiving First TOU Bill	
Canadian Niagara Power Inc Fort Erie	1000001	Residential	16/02/12	1109	
	1000001	GS<50kW	16/02/12	123	1232
	2000002	Residential	17/02/12	1336	
		GS<50kW	17/02/12	37	1373
	3000003	Residential	18/02/12	1055	
	3000003	GS<50kW	18/02/12	15	1070
		Residential	19/02/12	1050	
	4000004	GS<50kW	19/02/12	112	1162
		Residential	20/02/12	997	
	5000005	GS<50kW	20/02/12	15	1012
	6000006	Residential	23/02/12	1069	
	6000006	GS<50kW	23/02/12	41	1110
	7000007	Residential	25/02/12	1655	
	7000007	GS<50kW	25/02/12	22	1677
		Residential	27/02/12	828	
	8000008	GS<50kW	27/02/12	33	861
	9000009	Residential	01/03/12	1048	
	9000009	GS<50kW	01/03/12	81	1129
	10000010	Residential	06/03/12	883	
	10000010	GS<50kW	06/03/12	15	898
	11000011	Residential	06/03/12	517	
	11000011	GS<50kW	06/03/12	71	588
	12000012	Residential	07/03/12	1130	
		GS<50kW	07/03/12	88	1218
		Residential	09/03/12	1112	
		GS<50kW	09/03/12	65	1177
		Residential	10/03/12	537	
	14000014	GS<50kW	10/03/12	80	617
	57000029	GS<50kW	10/03/12	360	360
					15484

Distributor Name (Please enter your Company name below)	Route	Rate Class	Date of First TOU Bill Sent/to be Sent (enter in date format dd/mm/yy - like	Number of Customers Received/Receiving First TOU Bill
Canadian Niagara Power Inc Port Colborne Hydro		Residential	16/02/12	722
		GS<50kW	16/02/12	131
		Residential	19/02/12	1344
		GS<50kW	19/02/12	13
		Residential	20/02/12	1069
		GS<50kW	20/02/12	25
	63000063	Residential	24/02/12	769
	63000063	GS<50kW	24/02/12	19
	64000064	Residential	27/02/12	595
	64000064	GS<50kW	27/02/12	29
	65000065	Residential	03/03/12	1550
	65000065	GS<50kW	03/03/12	383
	68000068	Residential	08/03/12	1135
	68000068	GS<50kW	08/03/12	55
	69000069	Residential	10/03/12	1072
	69000069	GS<50kW	10/03/12	33
	67000067	GS<50kW	10/03/12	50

Distributor Name (Please enter your Company name below)	Route	Rate Class	Date of First TOU Bill Sent/to be Sent (enter in date format dd/mm/yy - like 23/06/10)	Number of Customers Received/Receiving First TOU Bill
Canadian Niagara Power Inc Eastern Ontario Power	72000001	Residential	18/02/12	740
		GS<50kW	18/02/12	15
	72000002	Residential	20/02/12	375
		GS<50kW	20/02/12	15
	72000003	Residential	27/02/12	520
		GS<50kW	27/02/12	99
	72000004	Residential	31/02/12	558
		GS<50kW	31/02/12	19
	72000005	Residential	03/03/12	635
		GS<50kW	03/03/12	89
	72000007	Residential	03/05/12	256
		GS<50kW	03/05/12	173
		100 100	00,00,12	2404

3494

Distributor Name (Please enter your Company	Rate Class	Date of First TOU Bill	Number of Customers
name below)		Sent/to be Sent (enter in	Received/Receiving
		date format dd/mm/yy - like	First TOU Bill
		23/06/10)	
Algoma Power Inc.	Residential	07/07/2012	1327
Algoma Power Inc.	Residential	14/07/2012	1327
Algoma Power Inc.	Residential	21/07/2012	1327
Algoma Power Inc.	Residential	28/07/2012	1327
Algoma Power Inc.	Residential	04/08/2012	1328
Algoma Power Inc.	Residential	11/08/2012	1328
Algoma Power Inc.	Residential	18/08/2012	1328
Algoma Power Inc.	Residential	25/08/2012	1328
Algoma Power Inc.	GS<50kW	07/07/2012	118
Algoma Power Inc.	GS<50kW	14/07/2012	118
Algoma Power Inc.	GS<50kW	21/07/2012	118
Algoma Power Inc.	GS<50kW	28/07/2012	118
Algoma Power Inc.	GS<50kW	04/08/2012	118
Algoma Power Inc.	GS<50kW	11/08/2012	118
Algoma Power Inc.	GS<50kW	18/08/2012	118
Algoma Power Inc.	GS<50kW	25/08/2012	119

Distributor Name (Please enter your Company name below)	Rate Class	Municipality	Date of First TOU Bill Sent to/ be Sent (enter in date)	Number of Customers Received/Receiving First TOU Bill
Westario Power Inc.	Residential	Mildmay-Pilot	5-Dec-11	527
Westario Power Inc.	GS < 50 kW	Mildmay-Pilot	5-Dec-11	86
Westario Power Inc.	Residential & GS < 50 kW	Walkerton	3-Jan-12	2305
Westario Power Inc.	Residential & GS < 50 kW	Neustadt	4-Jan-12	272
Westario Power Inc.	Residential & GS < 50 kW	Hanover	4-Jan-12	3249
Westario Power Inc.	Residential & GS < 50 kW	Elmwood	4-Jan-12	184
Westario Power Inc.	Residential & GS < 50 kW	Clifford	5-Jan-12	369
Westario Power Inc.	Residential & GS < 50 kW	Harriston	5-Jan-12	919
Westario Power Inc.	Residential & GS < 50 kW	Palmerston	5-Jan-12	1156
Westario Power Inc.	Residential & GS < 50 kW	Kincardine	9-Jan-12	3414
Westario Power Inc.	Residential & GS < 50 kW	Lucknow	10-Jan-12	643
Westario Power Inc.	Residential & GS < 50 kW	Ripley	10-Jan-12	335
Westario Power Inc.	Residential & GS < 50 kW	Port Elgin	11-Jan-12	3577
Westario Power Inc.	Residential & GS < 50 kW	Southampton	16-Jan-12	2497
Westario Power Inc.	Residential & GS < 50 kW	Teeswater	17-Jan-12	510
Westario Power Inc.	Residential & GS < 50 kW	Wingham	17-Jan-12	1534

Distributor Name (Please enter your Company	Rate Class	Date of First TOU Bill	Number of Customers
name below)		Sent/to be Sent (enter in	Received/Receiving
		date format dd/mm/yy - like	First TOU Bill
		23/06/10)	
Grimsby Power - Pilot Group	Residential	09/11/11	649
Grimsby Power	Residential	04/01/12	386
Grimsby Power	Residential	10/01/12	1135
Grimsby Power	Residential	11/01/12	574
Grimsby Power	Residential	12/01/12	372
Grimsby Power	Residential	16/01/12	858
Grimsby Power	Residential	18/01/12	428
Grimsby Power	Residential	19/01/12	546
Grimsby Power	Residential	20/01/12	578
Grimsby Power	Residential	23/01/12	764
Grimsby Power	Residential	24/01/12	510
Grimsby Power	Residential	27/01/12	664
Grimsby Power	Residential	30/01/12	657
Grimsby Power - Pilot Group	GS<50kW	09/11/11	22
Grimsby Power	GS<50kW	04/01/12	181
Grimsby Power	GS<50kW	10/01/12	179
Grimsby Power	GS<50kW	11/01/12	10
Grimsby Power	GS<50kW	12/01/12	19
Grimsby Power	GS<50kW	16/01/12	7
Grimsby Power	GS<50kW	18/01/12	34
Grimsby Power	GS<50kW	19/01/12	15
Grimsby Power	GS<50kW	20/01/12	10
Grimsby Power	GS<50kW	23/01/12	2
Grimsby Power	GS<50kW	24/01/12	1
Grimsby Power	GS<50kW	27/01/12	70
Grimsby Power	GS<50kW	30/01/12	12