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ONTARIO ENERGY BD



EB-2011-0048

BY COURIER

February 10, 2011

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

Dear Ms. Walli:

**RE: BRANTFORD POWER INC. APPLICATION FOR EXTENSION OF
MANDATORY ENROLLMENT TESTING DATE AND TIME-OF-USE
BILLING IMPLEMENTATION**

On August 4, 2010, the Ontario Energy Board ("the Board") issued a letter to all electricity distributors with regards to the "Determination under Section 1.2.1 of the Standard Supply Service Code to Mandate Time-of-Use Pricing for Regulated Price Plan Consumers Board File No. EB-2010-0218. In that letter, the Board issued its final determination to mandate Time-of-Use ("TOU") pricing for Regulated Price Plan ("RPP") consumers by establishing the mandatory TOU date and Mandatory Enrollment testing date for each electricity distributor. In the case of Brantford Power Inc. ("BPI"), the mandatory enrollment testing date was September 2010 and the mandatory TOU date was July 2011.

BPI hereby requests an extension of the mandatory enrollment testing date from September 2010 to July 2011 and an extension of the mandatory TOU pricing roll-out from July 2011 to November 2011 with TOU bills to be issued starting in December 2011. The reasons for these requested extensions are discussed in greater detail below.

Further, BPI requests that this matter be disposed of by way of a written hearing.

BACKGROUND:

On November 8, 2010, BPI received correspondence from Mr. Hewson, Senior Manager, Networks & Smart Grid, seeking a detailed explanation regarding BPI's lack of progress towards the implementation of TOU billing and its plan for moving forward. BPI had not achieved its mandatory enrollment testing date of September 2010 but until that time was of the view that it would meet the mandatory TOU implementation date on July 2011. Brantford Power's initial response to that correspondence was filed with Board staff on November 15, 2010 and is included below as Attachment 1.

Also on November 8, 2010, BPI received an e-mail from its Customer Information System ("CIS") vendor advising that because the vendor had not included the impacts of programming changes required to implement new billing and collections requirements for low income customers for January 1, 2011 in its planning, there would be a two-month delay in the delivery of a major module -- the Bill Calculation and Printing component, of the CIS software. This two-month delay in the delivery of a critical component of the CIS software to enable TOU billing is the significant event that is causing the request for amended timelines.

In light of this delay, BPI assessed its impacts and submitted revised implementation plans to Board staff on November 29, 2010. That correspondence along with a revised plan is included below as Attachment 2.

Subsequently, the Ontario Government announced the Clean Energy Benefit to be effective January 1, 2011, which required additional programming changes to the Customer Information System ("CIS"). BPI began to issue invoices adapted to comply with the OCEB Act and OCEB Regulation as of January 21, 2011.

FACTORS CONSIDERED IN MAKING REQUEST:

In assessing and adjusting its time-of-use implementation plan, BPI has considered two factors in addition to the delay in delivery of the CIS software:

1. The amended plan allows one month after the cut-over to the MDM/R to use data from the MDM/R at the end of September 2011 with conventional billing in order to test and improve billing data quality and reduce subsequent manual adjustments to customers' bills; and
2. The amended plan avoids introducing TOU bills to customers in November 2011 when the time-of-use periods and prices change. BPI believes that by not issuing the first TOU bills in November 2011, it will minimize customer confusion around TOU billing and its impacts will be minimized and ultimately, customer education about TOU pricing will be enhanced.

Although delaying the implementation of TOU pricing will require adjustments to other internal projects and priorities and the reallocation of staff resources among those priorities, BPI does not anticipate that the requested amendments to the mandatory timelines will impact the costs of either the smart meter roll-out or implementation of TOU pricing.

BPI does not anticipate any internal factors that may hinder compliance with the requested timelines. The necessary changes to the CIS software to begin Unit Testing have been received and internal CIS testing of these changes has been completed. Although BPI has not yet received the final installment of CIS software changes, receipt of this final installment, expected in February 2011, has been built into the requested timeline. BPI also notes that the IESO accepted BPI's enrolment wave assignment on December 3, 2010. The confirmed start dates for testing with the IESO are set out in Table 1 -- Revised Schedule of Major Milestones, below.

Apart from regulated changes that may impact CIS programming that are not currently known, BPI is not aware of any other external factors that may hinder compliance.

REVISED SCHEDULE OF MAJOR MILESTONES:

If the requested timelines are approved by the Board, the schedule for major milestones leading to TOU implementation in November 2011 with TOU bills to be issued starting in December 2011 are as follows:

Table 1 – Revised Schedule of Major Milestones

Activity	Scheduled Start Date (IESO)	Target Completion Date
CIS Internal Testing		January 26, 2011
Unit Testing	February 8, 2011	July 25, 2011
SME_FORM_0007		June 27, 2011
System Integration Testing	July 25, 2011	August 5, 2011
Qualification Testing	August 11, 2011	September 2, 2011
Self Certification – Cutover	September 13, 2011	September 19, 2011
Transition to Production Operations		September 27, 2011

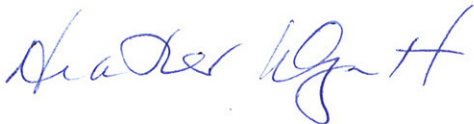
The current status and progress on the milestones that BPI is currently required to report on, as of January 31, 2011 is included below in Attachment 3.

CONCLUSION:

BPI is committed to implementing TOU pricing for its RPP customers in a timely manner. The requested amendments of the timelines for mandatory enrollment testing date from September 2010 to July 2011 and for mandatory TOU pricing roll-out from July 2011 to November 2011 with TOU bills to be issued starting in December 2011 will enable BPI to successfully implement TOU pricing.

If you require any further information, please do not hesitate to contact me.

Yours truly



Heather Wyatt
Manager of Regulatory Compliance and Governance,
Board Secretary

cc: Mr. George Mychailenko, CEO

ATTACHMENTS:

1. Correspondence with Board Staff dated November 15, 2010
2. Correspondence with Board Staff dated November 29, 2010
3. Smart Meter/TOU Implementation Monthly Report as at January 31, 2011

ATTACHMENT 1
Correspondence with Board Staff dated November 15, 2010

November 15, 2010

BY E-MAIL

Ms. Rachel Anderson
Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto ON
M4P 1E4

**Re: Determination under Section 1.2.1 of the Standard Supply Service Code to
Mandate Time-of-Use Pricing for Regulated Price Plan Customers
Board File No. EB-2010-0218**

Dear Ms. Anderson:

On November 8, 2010, Brantford Power Inc. received correspondence from Mr. Hewson, Senior Manager, Networks & Smart Grid, seeking a detailed explanation regarding Brantford Power's lack of progress towards the implementation of TOU billing and its plan for moving forward. Brantford Power's response to the information requested is set out below.

o Why Brantford Power was unable to comply with its mandatory enrolment testing date, including the date when it determined that its baseline plan was no longer achievable

The mandatory enrolment testing date of September 2010 was derived from Brantford Power's baseline plan filed with the Ontario Energy Board on July 10, 2009. Brantford Power was unable to comply with that mandatory enrolment testing date in that plan because its Customer Information System ["CIS"] software had not been modified for time-of-use billing to permit testing at that date.

Brantford Power became aware that milestones within its baseline plan were not achievable on July 10, 2010 when the Ontario Energy Board issued its mandated timelines for time-of-use implementation. Brantford Power submitted a revised baseline plan at that time, which was not accepted.

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Brantford Power Inc.
84 Market Street, P.O. Box 308, Brantford, Ontario N3T 5N8

- The steps that have been taken to date by Brantford Power to prepare for enrolment with the MDM/R;

Brantford Power has undertaken the following steps to prepare for enrolment with the MDM/R:

1. Installed 95% of smart meters as at November 15, 2010 with 98% or more anticipated to be installed by year-end;
2. Recruited a project manager to oversee the information technology and systems ["IT"] requirements;
3. Recruited an IT technical staff person to replace a staff resource who had resigned;
4. Trained new staff resources;
5. Created a project team with Project Sponsor, Project Review Committee, Regulatory Lead, Billing Lead, Customer Services Lead, Metering and Settlement Lead, Media and Public Relations Lead;
6. Working with the new Project Manager, external consultant and IESO project manager, updated the project plan and circulated it to the IESO and external consultant for comment;
7. Identified an insufficiency in business processes and recruited external consultant advice to educate the team through 5 separate training sessions;
8. Acquired AS2 software required to communicate with the MDM/R; and
9. Initiated the acquisition processes to update AS/400 hardware in order to support the additional test environment requirements.

Brantford Power further notes that during this time period, it has continued to work in partnership with its CIS vendor and the other utilities that use the same CIS software on the programming changes needed to permit time-of-use billing.

- Brantford Power's plan for enrolment with the MDM/R, including scheduling an enrolment testing date, the submission of a project plan, and an explanation about how this plan will result in the achievement of Brantford Power's mandatory TOU date;

Brantford Power has filed monthly reports on August 10, 2010 and September 10, 2010 reporting on its progress to time-of-use implementation. Based on information available to Brantford Power at those times, Brantford Power was of the opinion that the mandated date to implement time-of-use pricing starting in July 2011 was achievable. Specifically, this plan was based on receipt of reprogrammed software for testing during the first week of December 2010.

On November 8, 2010, Brantford Power received an e-mail from its CIS vendor advising that because the vendor had not included the impacts of programming changes required to implement new billing and collections requirements for low income customers for January 1, 2011, there would be a two-month delay in the delivery of a major component -- the Bill Calculation and Printing component, of the CIS software.

Brantford Power along with its service providers, is currently assessing the impacts of this two-month delay in the delivery of this component of the CIS software and is reviewing and revising its implementation plans. Although those revised plans are not available at this time, Brantford

Power will provide adjusted plans for enrolling with the MDM/R and implementing time-of-use billing including timelines and specific activities by November 29, 2010.

- o Any factors (internal and/or external) Brantford Power has identified that may hinder its ability to comply with its mandatory TOU date, including the date(s) when Brantford Power identified these factors as hindrances;

As discussed above, the two-month delay in the delivery of the Bill Calculation and Print component of the CIS software, of which Brantford Power was notified on November 8, 2010, will hinder its ability to meet the mandatory TOU date.

- o Any dependencies Brantford Power has on third parties (e.g., AMI/meter vendors, CIS vendors, other distributors and consultants) in order to enroll with the MDM/R and implement time-of-use billing; and

Brantford Power is working with the following third party vendors to enroll with the MDM/R and implement time-of-use billing: Corporation of the City of Brantford IT Services, Customer Services and Metering Departments; Daffron [CIS vendor]; Sensus [AMI system provider]; Savage [operational data system provider]; UtilAssist [consulting services] and hardware vendors.

As well, Brantford Power advises that it has been working with other utilities that use the same CIS software to define system requirements and share software testing.

- o Brantford Power's plan for enrolling with the MDM/R and implementing time-of-use billing, including timelines and specific activities which must be undertaken in addition to the ten milestones reported on each month.

As discussed above, Brantford Power along with its service providers, is currently assessing the impacts of the delay in the delivery of a major component of its CIS software and is reviewing and revising its implementation plans. Although those revised plans are not available at this time, Brantford Power will provide adjusted plans for enrolling with the MDM/R and implementing time-of-use billing including timelines and specific activities to the Ontario Energy Board by November 29, 2010.

If you require any further information or explanation, please do not hesitate to contact me by e-mail at hwyatt@brantford.ca or by telephone at 519 751-3522 Ext. 3269.

Yours truly

Original Signed By

Heather Wyatt
Manager of Regulatory Compliance and Governance
Board Secretary

cc. Mr. George Mychailenko, CEO

ATTACHMENT 2
Correspondence with Board staff dated November 29, 2010

BY E-MAIL

Ms. Rachel Anderson
Ontario Energy Board
P.O. Box 2319
27th Floor
2300 Yonge Street
Toronto ON
M4P 1E4

Re: **Determination under Section 1.2.1 of the Standard Supply Service Code to Mandate Time-of-Use Pricing for Regulated Price Plan Customers**
Board File No. EB-2010-0218

Dear Ms. Anderson:

On November 15, 2010, Brantford Power Inc. ("BPI") filed a response to correspondence from Mr. Hewson, Senior Manager, Networks & Smart Grid, seeking a detailed explanation regarding Brantford Power's lack of progress towards the implementation of TOU billing and its plan for moving forward. BPI's response to the information requested is set out below.

In that correspondence, BPI stated that:

On November 8, 2010, Brantford Power received an e-mail from its CIS vendor advising that because the vendor had not included the impacts of programming changes required to implement new billing and collections requirements for low income customers for January 1, 2011, there would be a two-month delay in the delivery of a major component -- the Bill Calculation and Printing component, of the CIS software.

Brantford Power along with its service providers, is currently assessing the impacts of this two-month delay in the delivery of this component of the CIS software and is reviewing and revising its implementation plans. Although those revised plans are not available at this time, Brantford Power will provide adjusted plans for enrolling with the MDM/R and implementing time-of-use billing including timelines and specific activities by November 29, 2010.

In the intervening time, the Ontario Government has announced the Clean Energy Benefit to be effective January 1, 2011, which will require additional programming changes to the Customer Information System ("CIS").

BPI has completed its assessment of the impacts of the delay in the delivery of a component of the CIS software and is targeting a revised date to begin time-of-use

billing using November 2011 consumption with the first time-of-use bills to be issued in December 2011. BPI is submitting an adjusted time-of-use implementation plan as an attachment to this letter.

In adjusting its time-of-use implementation plan, BPI has considered two factors in addition to the delays in delivery of the CIS software:

1. The amended plan allows one month after the cut-over to the MDM/R to use data from the MDM/R at the end of September 2011 with conventional billing in order to test and improve billing data quality and reduce subsequent manual adjustments to customers' bills; and
2. The amended plan avoids introducing time-of-use bills in November 2011 when the time-of-use periods and prices change. BPI believes that by not issuing the first time of use bills in November 2011, it will minimize customer confusion around TOU billing and its impacts and ultimately enhance customer education.

If you require any further information or explanation, please do not hesitate to contact me by e-mail at hwyatt@brantford.ca or by telephone at 519 751-3522 Ext. 3269.

Yours truly

Original Signed By

Heather Wyatt
Manager of Regulatory Compliance and Governance
Board Secretary

cc. Mr. George Mychailenko, CEO

ATTACHMENT: Time-of-Use Implementation Baseline Plan

Time of Use Implementation Baseline Plan

This plan follows the same format as the information reported to the Board on July 10, 2009. The parts of the plan that have changed are highlighted in yellow. The information is current to November 26, 2010. The significant parts of the baseline report that were modified are Part I, section 4 (to reflect the new SME Milestones) and Part II (the table of installed, enrolled, notified and billed customers for TOU).

Baseline Report: Part I

The following information must be provided to the Board by **July 10, 2009**. The information should be current to November 26, 2010.

1. Please indicate whether you have entered into any contracts with an advanced metering infrastructure (“AMI”) system vendor. If so, please provide the name of the vendor, the date of the contract, and the percentage of your total number of smart meters that will be acquired from the vendor. If you have entered into contracts with multiple vendors, please provide the requested information for each vendor. **BPI Response:** BPI has contracted Sensus for its AMI system. BPI has contracted Sensus and Elster to supply meters.
2. Please indicate whether you have started to install smart meters for RPP-eligible consumers in your service area. If so, please indicate the following: (a) the date on which you started that deployment; (b) the total number of RPP-eligible consumers, by customer class; (c) the number of smart meters that have been installed for RPP-eligible consumers, by customer class; and (d) the percentage of each such customer class for which smart meters have been installed. **BPI Response:** BPI has started to install smart meters. (a) December 2008. (b) 34,491 residential customers & 2,701 general service < 50kW customers. (c) 34,158 residential customers & 1,125 general service < 50kW customers. (d) 99.03% of residential customers & 41.65% of general service < 50kW customers.
3. Please indicate if you have started to deploy any AMI systems or structures? If so, please indicate the status of your AMI system and when it will be fully operational. If not, please indicate when you plan to start to deploy AMI systems or structures, and the date by which you plan to have the AMI system fully operational. **BPI Response:** BPI has deployed a single AMRC (Sensus TGB). BPI is part of a group of LDCs who share a single AMCC (Sensus RNI). The AMCC is deployed and operational.
4. Please indicate whether you have started to integrate your meters and systems with the provincial MDM/R. If so, please identify: (a) the status of that integration, based on the following four steps of the MDM/R integration process: testing, meter registration, meter data, billing data acquisition; and (b) the date on which you plan to have the integration completed. If not, please indicate when you plan to start to integrate your meters and systems with the provincial MDM/R

and the date on which you plan to have the integration completed. **BPI Response:** BPI has begun the initial registration steps with the MDM/R. Our MDM/R Registration Application was accepted on March 8, 2010. Our AMCC internal testing is complete; the supplier has some additional work to complete before the Read Interval Success level will consistently meet an acceptable level. BPI has submitted completed SME forms 4, 6 and 14. the following table summarizes the ten SME Milestones and expected completion dates.

Activity	Expected Completion Date
AMCC Internal Testing	September, 23, 2010
CIS Internal Testing	January 26, 2011
MDM/R Registration Application submitted	March 8, 2010
Enrolment Wave requested/confirmed	December 3, 2010
Unit Testing complete	July 25, 2011
SME FORM 0007	June 27, 2011
System Integration Testing complete	August 5, 2011
Qualification Testing complete	September 2, 2011
Self Certification – Cutover	September 19, 2011
Transition to Production Operations	September 27, 2011

5. Please indicate whether you have started to make changes to your business processes and systems related to MDM/R and TOU implementation, including your Customer Information Systems (“CIS”), that may be required to implement TOU billing. If so, please provide the current status of those changes and the date on which the necessary changes are planned to be completed. If not, please indicate when you plan to start making any necessary changes and when those changes are planned to be completed. **BPI Response:** BPI has engaged our CIS vendor. The Vendor does not expect to have completed programming until January 2011 and BPI will require an additional four weeks to complete our coding and testing. BPI expects to begin Unit Testing in March 2011.
6. Please indicate whether you have developed a plan for the implementation of web presentment of TOU data to each RPP-eligible consumer requesting the data. If so, please describe that plan. If not, please indicate when you expect to develop that plan. **BPI Response:** BPI has commenced work to assess the tools required to provide web presentment of TOU data to each RPP-eligible customer.
7. Please indicate whether you have started to implement a consumer education program with respect to the implementation of TOU pricing and billing for RPP-eligible consumers. If so, please provide the date on which the first consumer education material was provided to RPP-eligible consumers. If not, please indicate the date(s) on which you plan to commence the delivery of consumer education materials. **BPI Response:** BPI prepared a leave behind package for each customer that was delivered at the time of smart meter installation.

Baseline Report: Part II

Please complete the following form using actual (to November 26, 2010) and planned (November 29, 2010 to December 31 30, 2011) information, based on the last day of the month.

Month	Residential				GS<50kW			
	Meters Installed	Meters Enrolled	ToU Notice Sent	ToU Billing	Meters Installed	Meters Enrolled	ToU Notice Sent	ToU Billing
Jan-10	8247				3			
Feb-10	11193				285			
Mar-10	18103				350			
Apr-10	21142				403			
May-10	25569				525			
Jun-10	30075				695			
Jul-10	32511				849			
Aug-10	32755				909			
Sep-10	32894				962			
Oct-10	34036				1062			
Nov-10	34158				1125			
Dec-10	34268				1384			
Jan-11	34378				1644			
Feb-11	34491				1903			
Mar-11					2162			
Apr-11					2422			
May-11					2681			
Jun-11					2701			
Jul-11								
Aug-11								
Sep-11		34491				2701		
Oct-11			34491				2701	
Nov-11				34491				2701
Dec-11								

ATTACHMENT 3 Monthly Report

Smart Meter Time Of Use: Brantford Power Inc.: Submitted

Page 1 of 4

Summary

Distributor Name	Brantford Power Inc.	For the Period To	December 31, 2010	First Submitted On	January 7, 2011
For the Period From	December 1, 2010	Status	Submitted	Due Date	January 10, 2011
Submitter Name	Heather Wyatt	Report Version	0	Edit Date	January 7, 2011 10:31 AM
RRR Filing No	67				
Expiry Date	January 11, 2011				

RPP Eligible Consumers:

Description	Residential Class	General Service Less Than 50kW Class	Total
Total Number of RPP-eligible consumers	34,553	2,705	37,258
Number of smart meters installed in the period	201	95	296
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	34,359	1,220	35,579
Total cumulative number of smart meters registered with the MDM/R at the end of the period	0	0	0
Total cumulative number of consumers being charged TOU prices at the end of the period	0	0	0

Percentages (Calculated on Save)

Percentage of RPP-eligible consumers with smart meters installed at the end of the period		
Residential Class	General Service Less Than 50kW Class	Total
99.40	45.10	95.50
Percentage of total smart meters installed that are registered with the MDM/R at the end of the period		
Residential Class	General Service Less Than 50kW Class	Total

<https://www.errr.oeb.gov.on.ca/xmlloader.asp?type=loadform&formid=800000000000023E&recordid=00000000000003E1&ran...> 1/7/2011

0.00	0.00	0.00
Percentage of total RPP-eligible consumers being charged TOU prices 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	Status	Expected Completion Date	Actual Completion Date
1. AMCC Internal Testing		On Sch		September 23, 2010

Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
2. CIS Internal Testing	January 28, 2011	On Sch	January 26, 2011	

Activity	Yes or No?	Expected Completion Date	Actual Completion Date
3. MDM/R Registration Application submitted	Yes		March 8, 2010

Activity	Yes or No?	Status, If Yes	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)	Yes		December 3, 2010	December 3, 2010

Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date

<https://www.crrr.ocb.gov.on.ca/xmlloader.asp?type=loadform&formid=800000000000023E&recordid=00000000000003E1&ran...> 1/7/2011

5. Unit Testing	April 11, 2011	<input checked="" type="checkbox"/>	On Sche	July 25, 2011	<input checked="" type="checkbox"/>
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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)	March 28, 2011	<input checked="" type="checkbox"/>	On Sc	June 27, 2011

Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
7. System Integration Testing (SIT)	April 25, 2011	<input checked="" type="checkbox"/>	On Sc	August 5, 2011

Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
8. Qualification Testing (QT)	May 20, 2011	<input checked="" type="checkbox"/>	On Sch	September 2, 2011

Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
9. Self Certification - Cutover	June 3, 2011	<input checked="" type="checkbox"/>	On Sch	September 19, 2011

Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
10. Transition to Production Operations	June 17, 2011	<input checked="" type="checkbox"/>	On Sc	September 27, 2011

Additional Comments and Information

Additional Comments
All dates reflect SME confirmed enrollment wave.

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

<https://www.etrn.oeb.gov.on.ca/xmlloader.asp?type=loadform&formid=800000000000023E&recordid=00000000000003E1&ran...> 1/7/2011