Board Staff Interrogatories Application for Exemption from Mandated Time of Use Pricing Date for Regulated Price Plan Consumers Brantford Power Inc. EB-2011-0048 Dated March 17, 2011

Board Staff question 1

Preamble

Brantford Power Inc. ("Brantford Power") states in its application that it is seeking an extension to its mandatory enrollment testing date from September 2010 to July 2011 and an extension to its Time-Of-Use ("TOU") pricing date from July 2011 to November 2011. On August 4, 2010 the Board issued a determination under Section 1.2.1 of the Standard Supply Service Code to require the implementation of TOU pricing that stated the Board "acknowledges that distributors may encounter extraordinary and unanticipated circumstances during the implementation of TOU pricing. The Board requests that any distributor encountering such circumstances bring these matters to the Board's attention without delay in order that the Board can assess the impact on the distributor's mandatory TOU date and assess whether any adjustment in that date is warranted."

Questions

- a) Please specify and describe in detail the extraordinary and unanticipated circumstances that have led Brantford Power to request an extension to its mandatory TOU pricing date.
- b) Please confirm the current status of Brantford Power's smart meter deployment and TOU implementation, including its progress on the ten milestones reported on each month.

Board Staff question 2

Preamble

Brantford Power states in its application that it experienced a two-month delay in the delivery of the Billing Calculation and Printing module of its Customer Information System ("CIS") software "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." The Board issued new customer service rules on July 2, 2010 and the Board provided notice of the rules to all electric distributors on that date.

Questions

- a) Please specify the new "programming changes" that were not originally included by the vendor.
- b) Please state the reasons why the "programming changes" noted above were not included in Brantford Power's CIS software.
- c) Please confirm the current status of Brantford Power's CIS system.

Board Staff question 3

Preamble

Brantford Power states in its application that "The amended plan avoids introducing TOU bills 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."

Questions

 Please describe in detail the nature and extent of the "customer confusion" that Brantford Power believes would occur if TOU billing was introduced in November 2011.