



April 4, 2011

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
27th Floor  
2300 Yonge Street  
Toronto, Ontario M4P 1E4

Via RESS and Courier

Dear Ms. Walli,

**RE: Application for Exemption from Mandated Time of Use Pricing. EB-2011-0048**

Please find attached Brantford Power Inc.'s reply submission to Board Staff's Interrogatories for the application for exemption from mandated Time of Use pricing.

We would be pleased to provide any further information or details that you may require.

Yours truly,

*Original signed by*

Heather Wyatt, Manager of Regulatory Compliance & Governance, Board Secretary  
Brantford Power Inc.

cc.

George Mychailenko, CEO  
Nadia Tahir, Senior Regulatory Analyst

**RESPONSES OF BRANTFORD POWER INC. ("BPI")  
TO  
BOARD STAFF INTERROGATORIES  
APPLICATION FOR EXEMPTION FROM MANDATED TIME OF USE PRICING DATE  
FOR REGULATED PRICE PLAN CONSUMERS**

**EB-2011-0048**

**DATED APRIL 4, 2011**

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## **Board Staff Question 1**

### **Preamble**

**Brantford Power Inc. (“Brantford Power”) states in its application that it is seeking an extension to its mandatory enrolment 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**

**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**

#### **BPI RESPONSE:**

Throughout 2009 and 2010, Brantford Power’s (“BPI”) Customer Information System (“CIS”) supplier had been working with a least one other electricity distributor to produce the required changes to the CIS to implement communication with the MDMR and implement TOU pricing. Beginning in the second quarter of 2010, BPI began reviewing the programming work done by the CIS vendor for its other electricity distributor client. As a result of this review and because of the differences between the other distributor’s Advanced Metering Infrastructure (“AMI”) and the base package software in the CIS, BPI and the CIS vendor agreed that the CIS vendor was not able to piggyback on work previously done for the other client but would need to start at the beginning for the programming changes needed to BPI’s version of the CIS software. BPI continued to work in cooperation with some of the other electricity distributors that use the same CIS software in order to benefit from shared learning experiences and reduce costs; however, many of these other distributors were at differing stages of development both from each other and from BPI. As well, BPI’s current version of the CIS contains significant custom coding to enhance customer service and improve

business process efficiency that needs to be re-applied to modified versions of the software and tested after standard programming changes are received. The detailed software design documents from the CIS vendor that were to have been received in September 2010, were not delivered on the original promised date. Subsequently, the CIS vendor and the electricity distributors that were working collaboratively, agreed to a software delivery timetable that would provide all the required software in three delivery phases:

- Back-end Data Capture between smart meters and the MDM/R (“SM1”);
- Basic User Interface with the MDM/R (“SM2”); and
- TOU Bill Calculation and Bill Print Modification (“SM3”), by December 10, 2010.

The CIS vendor did not have the programming specifications for SM1 ready until September 2010, for SM2, until November 2010 for SM3 until January 2011. BPI received actual SM1 programming changes in early November 2010 and received SM2 changes in January 2011. BPI advises that it is waiting for delivery of SM3 changes.

BPI notes that it implemented bi-monthly teleconference meetings with its CIS vendor starting April 29, 2010 to facilitate project coordination and communication with the vendor.

**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.**

**BPI RESPONSE:**

As of April 4, 2011,

- BPI has installed 34,519 of 34,626 residential meters with 107 remaining meters to be installed;
- BPI has installed 1,718 of 2,722 commercial meters with 1007 remaining meters to be installed by a target date of June 2011;

- Working with Sensus, BPI has overcome numerous noise and coverage problems to achieve 96.5% read interval success. BPI has successfully been billing customers RPP from the AMI since November 2010;
- BPI working with UtilAssist, has developed and documented the new business processes required for TOU billing; and
- BPI working with UtilAssist, has developed and documented 234 test scripts to ensure accurate and complete testing of our SM/TOU systems and to date has completed 32.

BPI is on target to the amended TOU implementation plan filed with OEB staff on November 28, 2010 and currently has its wave assignment in accordance with the amended plan.

The status of the ten TOU implementation milestones is summarized in Table 1 below:

**TABLE 1**  
**TOU IMPLEMENTATION MILESTONES STATUS**

<b>MILESTONE #</b>	<b>MILESTONE DESCRIPTION</b>	<b>STATUS</b>
1.3.1	Validate CMEP file meets TIS requirements	Complete
1.3.2	CIS internal changes and testing complete CIS	Complete (except for SM3)
1.3.3	Submit Registration Application to IESO	Complete
1.3.4	Assignment to enrolment wave by IESO	Complete
1.3.5	Unit test (Sand Box) complete (3-4 months)	12% Complete, Target Jul25, 2011
1.3.6	Prepare & Submit Draft Self Cert for Enrolment Testing	Target Jun27, 2011
1.3.7	Met SIT exit criteria Self-Certification – SIT Readiness (2 weeks)	Target Aug5, 2011
1.3.8	Met Qualification Testing Criteria Qualification Testing (26 days)	Target Sep2, 2011
1.3.9	Submit Self-Certification Cutover Readiness (SME_Form_0008) Self-certification – Cutover Readiness (1-2 weeks)	Target Sep19, 2011
1.3.10	Commence Cutover to MDM/R on Production CIS Transition to Production	Target Sep27, 2011

BPI is of the view that qualification testing and self-certification processes cannot be concluded until all the required programming changes to the CIS have been installed and end-to-end testing has been completed.

BPI further notes that the amended plan dated November 28, 2011 includes 1 month to operate the system in a production environment in order to build history in the MDMR and to improve VEE processes.

## **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**

**Please specify the new “programming changes” that were not originally included by the vendor.**

#### **BPI RESPONSE:**

With respect to the programming changes required to implement new customer services requirements [EB-2007-0722]:

- The programming changes required for October 1, 2010 to calculate arrears management plans were delivered to BPI on October 13, 2010;
- The programming changes required to automatically apply deposits before issuing disconnection notices, automatically generating letters to advise of the application of the deposit, to add a 3rd party to a customer account to receive overdue notices, functionality to track arrears management plan payments and disconnection windows to be implemented on January 1, 2011 were received by BPI on March 21, 2011. These programming changes still require testing. Although these programming changes to the CIS have not yet been implemented, BPI notes that it has used manual processes to comply with the new customer service rules since January 1, 2011.

There were no modifications required to the CIS to implement the customer services code changes that were effective on April 1, 2011.

**Please state the reasons why the “programming changes” noted above were not included in Brantford Power’s CIS software.**

**BPI RESPONSE:**

BPI has been advised that the CIS vendor is reluctant to undertake designing and coding software modifications until the regulatory framework and code amendments requiring such programming modification are finalized. Code amendments frequently change as a result of the Board’s code amendment consultation processes. For example, implementation of customer service changes relating to low income customers that were to have come into effect on January 1, 2011 has been delayed to October 2011 as set out in the Board’s Decision dated March 31, 2011. Undertaking system modification in advance of finalized code requirements would require additional modifications and revisions to work that had previously been completed.

**Please confirm the current status of Brantford Power’s CIS system.**

**BPI RESPONSE:**

Programming changes to the CIS related to customer service code amendments were discussed in the preceding response.

With respect to TOU implementation CIS changes, SMI and SM2 programming changes have been received; custom code has been applied and is being tested. BPI is connected to the MDMR and currently running User Acceptance Tests (UAT) for the CIS software prior to Systems Integration Testing (SIT) and Qualification Testing (QT). BPI has received the programming fixes to address issues identified in the testing with the MDM/R.

BPI has not received the SM3 programming changes as of April 4, 2011.

As discussed in the response to Interrogatory 1, above, BPI also has custom code changes to the CIS that need to be applied and tested each time the vendor supplies programming changes.

### **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.**

#### **BPI RESPONSE:**

Delaying the introduction of the implementation of TOU billing by one month reduces customer confusion with respect to the changes in summer and winter pricing periods and the introduction of TOU billing. That is, if BPI introduces TOU billing in October the first TOU bills will include consumption that will be billed at the summer TOU price periods and the winter TOU price periods, with the likelihood of different rates for the summer and winter periods. By introducing TOU billing in November, with the first bills issued in December, customers will receive their first TOU bill that includes consumption only for the winter TOU pricing periods. BPI is of the view that by separating out these two changes – the change from current summer to winter rates and the change to TOU billing, customers will more clearly see the impacts of TOU pricing as soon as it is introduced and as a result, can more readily begin adjusting their electricity usage during peak periods for the winter months.