



Greater Sudbury Hydro Inc  
Hydro du Grand Sudbury Inc

empowering communities  
le pouvoir aux communautés



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April 12, 2011

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

**Subject: Extension to mandated Time-of-Use Pricing (TOU) Implementation Date (EB-2010-0218)**

Dear Ms. Walli:

This application is made on behalf of Greater Sudbury Hydro Inc. (GSHi).

Pursuant to the Board's letter dated August 4, 2010 related to the above noted subject matter, GSHi has expended extensive effort attempting to prepare for its mandated TOU date that would require implementation of TOU billing in June for bills to be delivered commencing in September of 2011. Activities involved in this effort have included:

- Implementation of a new AMI system including the replacement of meters (with the exception of approximately 600 inaccessible meters some of which we have been refused access to), installation of communications networks and related computer systems required to collect and disseminate consumption data from the consumer's meter.
- Implementation of a new CIS system. The roll-over to this system was completed in early December 2010. Significant training, familiarization and component implementation has continued since the December go live date. In efforts to meet the time-of-use deadlines, the conversion was fast-tracked. The accelerated schedule and the fact that with every major IT project conversion to a new system there are significant challenges with respect to technical matters have impeded progress.
- While working to stabilize the new billing system GSHi was required to make significant changes to systems and processes to accommodate the Board's decision in relation to Customer Service, Rate Classification and Non-Payment Risk (EB-2007-0722).

- GSHi has commenced testing with Provincial MDMR and is attempting to maintain the initial schedule.

While GSHi's commitment to implement TOU rates for its customers in compliance with Section 1.2.1 of the Standard Supply Service Code (SSSC) has not waned, the reality is that the original schedule cannot be met without undue customer impact. It is critical the CIS system is functioning properly to facilitate testing and training to ensure a smooth transition to TOU pricing within the current schedule. A rushed implementation is likely to result in adverse customer impact. The schedule appended to this application will provide GSHi with sufficient time to ensure that the transition to TOU pricing will be smooth and seamless for its customers.

In light of the above GSHi requests as follows:

- An extension to its mandated TOU implementation to December 2011. A more detailed schedule is appended to this letter as Appendix A.
- Direction from the Board with respect to inaccessible meters where the property owner either refuses to allow access or to keep an appointment for a meter change. GSHi recognizes its responsibility and authority pursuant to S.40 of the Electricity Act S.O. 1998 and various regulatory instruments, to disconnect for non-payment or to eliminate a hazardous condition. GSHi is unclear as to whether this responsibility extends to enforcing compliance with Section 1.2.1 of the SSSC. Should the Board determine that the power to disconnect does not extend to this matter GSHi requests direction with respect to the treatment of those customers for billing purposes who have refused access and are then not metered in the prescribed fashion after cutover to TOU pricing.

I look forward to your reply,

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Kallonen', with a large, stylized initial 'F'.

Frank Kallonen  
President and CEO  
Greater Sudbury Hydro Inc.