



April 25, 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: Orangeville Hydro Limited - Exemption from Mandated Time-of-Use Pricing
Date for Regulated Price Plan Consumers
Board File No.: EB-2011-0082**

Please find the following response to the interrogatories relation to the above application.

Should you require further information, please feel free to contact me.

Kindest regards,

Orangeville Hydro Limited

Ruth Tyrrell
Vice-president, Administration

Enclosure

Board Staff Interrogatories
Application for Exemption from Mandated Time-of-Use Pricing
Date for Regulated Price Plan Consumers

Board Staff question 1

Preamble

Orangeville Hydro Limited ("Orangeville Hydro") filed an application dated March 15, 2011 with the Ontario Energy Board for a licence amendment granting an exemption in relation to the mandated date for the implementation of Time-of-Use ("TOU") pricing rates for Regulated Price Plan consumers. Orangeville Hydro is applying for an exemption from its June 2011 mandatory TOU date and requesting a new mandatory TOU date of September 2011. Orangeville Hydro states the reason for the exemption is due to delays experienced implementing and coordinating the roll-out and training on a new customer information system and advanced metering infrastructure network, which has caused Orangeville Hydro to fall behind on original wave testing dates with the Independent Electricity System Operator.

Questions

a) Please confirm the status of Orangeville's smart meter deployment and TOU implementation as of April 1, 2011.

OHL RESPONSE:

As of April 1, 2011,

- OHL installed 9,943 of 9,945 residential smart meters with 2 remaining meters to be installed;
- OHL installed 445 of 1,088 general service less than 50 kilowatts meters with 643 remaining meters to be installed;
- OHL is working with our AMI provider, meter supplier(s) and meter service provider to ensure the remaining meters are installed as soon as possible, while ensuring customer service quality and reliable communication statistics

OHL is working closely with the IESO, IBM and Util-Assist throughout the TOU Implementation process. The status of the TOU Implementation Activities is provided in Table 1. OHL is submitting the status of the TOU Implementation Activities as of April 15, 2011 due to recent progress and completion of Activity #7: System Integration Testing (SIT).

Table 1

	TOU Implementation Activity	Status (as of April 15, 2011)
1	AMCC Internal Testing	COMPLETED
2	CIS Internal Testing	COMPLETED
3	MDM/R Registration Application submitted	COMPLETED
4	Enrolment Wave requested and confirmed	COMPLETED
5	Unit Testing	COMPLETED
6	Submitted a completed Self Certification for Enrolment Testing SME_FORM_0007	COMPLETED
7	System Integration Testing (SIT)	COMPLETED
8	Qualification Testing (QT)	Target May 16, 2011
9	Self Certification – Cutover	Target May 27, 2011
10	Transition to Production Operations	Target October 1, 2011

b) Please describe in detail the factors that Orangeville considered in making this application, including a clear description of the unanticipated and extraordinary circumstances that have prompted Orangeville's application.

OHL RESPONSE:

Orangeville Hydro Limited completed a go live conversion to a new CIS in November 2009. Over the course of 2010 staffing was limited due to implementation of a new CIS that consumed much of their time. The CIS System also required many patches/builds to ensure it could handle the smart meter initiative and communication with the ODS, MDMR, Sensus and other third party vendors. There have also been a number of code changes that have enforced programming and configuration changes in CIS to implement the OEB mandated Customer Service Code Amendments, Leap, Arrears Management Program and Continuous Service Agreements with Landlords and the Ontario Government's Clean Energy Benefit. These mandates consume staffing resources.

Orangeville Hydro Limited requires additional time to deploy GS<50 meters as we have experienced some delay in procurement of meters for this customer class. Orangeville Hydro will also be dealing with a large change in the billing interface once the MDM/R upgrades to R7.2 with the Measurement Canada Solution. At the time our plan was submitted we were not aware that this was a requirement and extensive regression testing will be required.

c) Please explain the issues Orangeville has encountered during its wave testing and TOU implementation, including timelines.

OHL RESPONSE:

Orangeville Hydro Limited is part of the Utility Collaborative Services (UCS) consortium of 9 LDCs that are working collaboratively through the MDM/R testing. The consortium has a staff member that is working with each LDC to ensure the systems and testing are in place in order to succeed. When a number of road blocks arose with the various systems we took a step back to reassess the

testing phase schedule and worked with the IESO to come up with a schedule that could be achieved by the 9 LDCs. We feel this is the right approach to avoid a bottleneck at the IESO and to ensure the testing is thoroughly and successfully completed by all.

Issues during wave testing:

- New CIS required patches and alterations to become compatible with the MDMR
- Wave Testing proved to become more resource intensive than initially expected at the time of initial Board filing
- Integration of AMCC, ODS, CIS, AS2 Client and MDMR proved to be more resource intensive than initially expected at the time of the initial Board filing

OHL has been working closely with Util-Assit, IESO, IBM, AMI provider and ODS provider throughout the wave testing and TOU implementation. To date, OHL has completed Unit Testing and System Integration Testing. Both rounds of testing revealed gaps and issues with the various systems involved. OHL is aggressively working towards finding solutions to issues as they arise.

Upon successful completion Qualification Testing, and receiving approval for cut-over to the MDM/R, Orangeville will follow a careful and precise process to ensure that all meters are successfully brought into the provincial system. This is expected to take at least the month of June to do the work and then have some time to monitor the new set-up to ensure it is providing completely accurate data and functioning properly.

d) Please explain how Orangeville's implementation experience has differed from Orangeville's expectations when it filed its baseline plan with the Board.

OHL RESPONSE:

The baseline plan filed with the Board was an estimate ONLY at the time. As we proceed with the process of integrating multiple systems together we have since discovered some gaps with the various systems that have taken some time to resolve. Please refer to the previous question as it clarifies some of the issues.

e) Are there any other factors (internal and/or external) that Orangeville has identified that may hinder its ability to comply with their requested mandatory TOU date?

OHL RESPONSE:

OHL has identified three factors that may hinder its ability to comply with our requested mandatory TOU date:

- MDM/R issues regarding Measurement Canada's register reading requirement for TOU billing invoices

- OHL has recently received a shipment of poly-phase meters. As this is a new type of meter that has yet to be installed in the field, OHL cannot say for certain that the communication will be without issue.
- OHL has one cycle of 593 residential and 82 general service less than 50 kilowatt customers that require additional communication infrastructure to ensure reliable interval and register reads. OHL is working closely with our AMI provider to install the required infrastructure. As this equipment is not installed to date, OHL cannot say for certain that this cycle will not have future communication issues.