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**Commission de l'énergie
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April 29, 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: London Hydro Inc. - Exemption from Mandated Time-of-Use Pricing Date
for Regulated Price Plan Consumers
Board File No.: EB-2011-0092**

Please find enclosed Board Staff interrogatories respecting the above application.

Please forward the interrogatories along with this cover letter to the applicant in this proceeding.

Yours truly,

Original signed by

George Dimitropoulos
Analyst, Licence Applications

Attachment

Board Staff Interrogatories
Application for Extension from Mandated Time-of-Use Pricing
Date for Regulated Price Plan Consumers
London Hydro Inc.
EB-2011-0092
Dated April 29, 2011

Board Staff question 1

Preamble

London Hydro Inc. ("London Hydro") filed an application dated March 31, 2011 with the Ontario Energy Board for a licence amendment granting an extension in relation to the mandated date for the implementation of Time-of-Use ("TOU") pricing rates for Regulated Price Plan consumers.

London Hydro has applied for an extension to its June 2011 mandated TOU pricing date and requested a new date of May 2012. London Hydro states the extension is necessary due to advanced metering infrastructure ("AMI") vendor delays as well as Measurement Canada compliance issues.

Questions

- a) Please confirm the status of London Hydro's smart meter deployment and TOU implementation as of April 1, 2011.
- b) Please provide the details and basis of London Hydro's AMI Network Performance Timelines.
- c) Please provide the details of and rationale for London Hydro's seven month TOU billing implementation schedule that begins in November 2011 and ends in May 2012, including:
 - a. The billing cycle dates (and number of customers on each billing date);
 - b. When customers will begin to be billed on a TOU basis.
- d) Please explain in detail the barriers to a shorter TOU billing implementation schedule (e.g., beginning in November 2011 and ending in December 2011).
- e) Please describe in detail how costs are affected by the requested delay in London Hydro's TOU implementation.
- f) Are there any other factors (internal and/or external) that London Hydro has identified that may hinder its ability to comply with their requested mandatory TOU date?

Board Staff question 2

Preamble

In its application London Hydro cites compliance with Measurement Canada billing requirements as a factor for requesting an extension.

The Smart Metering Entity (“SME”)’s January monthly filing with the Board states that “In December, the IESO contracted for the development and delivery of software to support the 2011 Measurement Canada solution requirements within the required timeframes, and for software to enable early LDC testing of the new billing interface.”^[1]

As of February 28, 2011 there were 4,622,825 installed smart meters, 2,711,535 meters enrolled with the MDM/R and 1,912,252 customers on TOU billing.

On March 7, 2011 the SME announced that 25 LDCs were integrated with the MDM/R and that 27 LDCs were testing their systems and business processes with the MDM/R as of Feb. 25.

Questions

- a) With specific reference to the Measurement Canada solution development in place, please explain in detail why London Hydro believes this issue to warrant a delay in its implementation of TOU billing.
- b) Given that current status of meters enrolled in the MDM/R, LDCs integrated with the MDM/R, and customers on TOU billing, please explain in detail why London Hydro believes this issue to warrant a delay in its implementation of TOU billing.

Board Staff question 3

Preamble

In its application London Hydro cites Customer Acceptance of TOU as a factor for requesting an extension.

^[1] SME Time-of-Use Mandate Progress Report Through January 31, 2011:
http://www.oeb.gov.on.ca/OEB/Documents/SMdeployment/SME_TOU_Mandate_Progress_Report_Jan2011.pdf

As of February 28, 2011 there were 4,622,825 installed smart meters, 2,711,535 meters enrolled with the MDM/R and 1,912,252 customers on TOU billing.

Questions

- a) Please explain in detail how customer acceptance of TOU is an issue representing “*extraordinary and unanticipated circumstances*” related to the implementation of TOU billing.
- b) Please provide a description of all smart meter and TOU communications London Hydro has issued to its customers over the last two years. Please explain why these materials have not provided information to customers about the TOU implementation, and if so, why they were provided by London Hydro.
- c) Please explain in detail why London Hydro believes customer acceptance of TOU is a barrier to a shorter TOU billing implementation schedule.
- d) Please explain how delaying implementation will improve customer acceptance of TOU billing. Include all measures London Hydro plans to take to improve customer acceptance of TOU billing and their associated costs.
- e) Does London Hydro intend to inform those customers whose bills would be reduced by TOU billing that London Hydro has chosen to delay the implementation of TOU billing? If yes, when and how? If not why not?
- f) Has London Hydro performed analysis of the costs and benefits to their customers of delaying the implementation of TOU billing? If so, please provide this analysis.