



**Wellington North Power Inc.**

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May 19, 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: Response to Board Staff Interrogatories - Regarding Wellington North Power Inc.'s Application for an Extension to its Mandated Time-of-Use Pricing Date for Regulated Price Plan Consumers Board File No.: EB-2011-0114 OEB Licence: ED-2002-0511**

As directed in the Notice of Application and Written Hearing, please find enclosed Wellington North Power Inc. responses to Board Staff Interrogatories date May 12, 2011 regarding the company's application for an extension to its mandated time-of-use pricing date, for Regulated Price Plan Consumers.

If you have any questions regarding this submission, please e-mail Judy Rosebrugh [jrosebrugh@wellingtonnorthpower.com](mailto:jrosebrugh@wellingtonnorthpower.com) or Richard Bucknall [rbucknall@wellingtonnorthpower.com](mailto:rbucknall@wellingtonnorthpower.com) at Wellington North Power Inc. or contact by telephone at 519-323-1710 at your convenience.

Yours truly,

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**Response to Board Staff May 12, 2011 Interrogatories Regarding  
 Wellington North Power Inc.'s Licence ED-2002-0511 Application for Extension  
 to Mandated Time-of-Use Pricing Date  
 for Regulated Price Plan Consumers  
 EB-2011-0114**

**Question (a):**

**Please confirm the status of Wellington North's smart meter deployment and TOU implementation as of April 1, 2011.**

**Response from Wellington North Power Inc. to question (a)**

As at April 1, 2011:

- Wellington North Power Inc.'s Smart Meter deployment is complete. Smart Meter's (Elster Rex 2 and A3 meters) were installed throughout Wellington North Power Inc.'s service territory commenced in March 2010 and was completed by October 2010.
- TOU Implementation:  
 Wellington North Power Inc. has filed monthly "Smart Meter Time of Use" reports periodically to the Ontario Energy Board, using the OEB e-filing system. These pre-defined reports measure project progress against specific milestones and the table below (table 1) summarises Wellington North Power Inc.'s progress as at April 2011:

<b>Milestone</b>	<b>Expected Completion Date</b>	<b>Status</b>
<b>AMCC Internal testing</b> <i>(Advanced Metering Control Computer – receives &amp; stores meter read data and transmits data to Meter Data Mgmt/Repository )</i>	January 31, 2011	Completed
<b>CIS Internal testing</b> <i>(Customer Information System – Wellington North Power Inc uses the Harris application. Tested to ensure Harris interfaces with Meter Data Mgmt/Repository)</i>	November 30, 2010	Completed

**Response to question (a) continued:**

<b>MDM/R Registration Application submitted</b> <i>(Meter Data Mgmt/Repository application submitted by LDC)</i>	September 30, 2011	Completed
<b>Enrolment Wave Requested &amp; Confirmed</b>	October 31, 2010	Completed
<b>Unit Testing</b> <i>(Testing of scenarios between CIS system and MDM/R to ensure that day-to-day processes can be completed to maintain customer service standards &amp; billing performance)</i>	May 20, 2011	Delayed  <i>(see response to Question B for details)</i>
<b>Self-Certification for Enrolment Testing</b> <i>(Certification by Wellington North Power Inc. that day-to-day processes can be completed)</i>	February 25, 2010  May 20, 2011	Submitted / declined  To be re-submitted after successful Unit Testing
<b>System Integrity Testing</b> <i>(Testing by Wellington North Power Inc. to ensure all interfaces between the Customer Information System (Harris) and Meter Data Mgmt/Repository that are required by the meter to bill lifecycle can be performed)</i>	June 17, 2011	Delayed  <i>(see response to Question B for details)</i>
<b>Qualification Testing</b> <i>(Testing by Wellington North Power Inc. to ensure business processes can support the meter to bill process, i.e. end-to-end testing)</i>	July 15, 2011	Delayed  <i>(see response to Question B for details)</i>
<b>Self Certification</b> <i>(Authorized signed-off of end-to-end processes and system interfaces by Wellington North Power Inc.)</i>	July 29, 2011	Delayed  <i>(see response to Question B for details)</i>
<b>Transition to Production</b> <i>(Movement of processes &amp; system functionality into Wellington North Power Inc 'live' activities to enable Time-of Use billing.)</i>	September 12, 2011	Delayed  <i>(see response to Question B for details)</i>

Table 1

**Question (b):**

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

**Response from Wellington North Power Inc. to question (b)**

There are a number of contributing factors encountered by Wellington North Power Inc. that has prompted this application:

1. Before registering Smart Meters with the MDM/R, Wellington North Power Inc. completed the installation and training of a new billing system in October of 2010. Since then a number of critical issues occurred, requiring our vendor to complete a number of patches to the system. Once patches were installed, testing of the billing system was initiated and continued into early November, 2010.
2. Unexpectedly, at the end of December, 2010 one of our employees left the company and in January 2011, another of the organizations key employees resigned. This resulted in a lack of resources to carry on with our MDM/R testing and cutover plans. New employees have been hired, but still require additional intensive training in order to competently implement transaction through the Meter Data Management Repository.
3. The company initially completed Unit Testing on April 7, 2011 (as per monthly Smart Meter TOU Filings submitted periodically to the OEB) with support from a 3<sup>rd</sup> party. However the test evidence was rejected by MDM/R as it was deemed as incomplete. A revised Project Plan was submitted to the MDM/R and Unit-Testing re-commenced April 25<sup>th</sup> 2011 and is scheduled to be completed on May 20, 2011. (This will be reflected in the June 10<sup>th</sup> Smart Meter Filing to the OEB)

The project milestones following Unit-Testing, as identified in response to question (a), are sequential and therefore delayed. Consequently, the implementation of TOU billing at Wellington North Power Inc. will be delayed.

4. Wellington North Power Inc. is reliant upon the MDM/R to accept test results and evidence. The company did not expect the test evidence submitted to be rejected.
5. Wellington North Power Inc. is a small LDC and is efficiently managing projects and priorities as well as putting our customers first.

Projects in 2011 include Cost-of-Service Rate application, implementation of TOU billing and a migration to a new financial system together with adopting new activities (including CDM initiatives). Wellington North Power Inc. is managing these projects and priorities with an office staff of seven, of which, 2 staff are assigned to TOU testing.

Failure to complete rigorous testing of systems, data, interfaces and day-to-day processes could have a serious impact upon the exceptional customer service and standards provided by Wellington North Power Inc.

**Question (c)**

**Please provide timelines for Wellington North’s revised MDM/R testing and enrolment schedule.**

**Response from Wellington North Power Inc. to question (c)**

A timeline of Wellington North Power Inc.’s revised MDM/R testing and enrolment is illustrated in the table below (table 2). This timeline reflects the latest project plan that Wellington North Power Inc. submitted to the designated MDM/R Project Manager on May 19<sup>th</sup>, 2011:

<b>Milestone</b>	<b>Expected Completion Date</b>	<b>Notes</b>
<p><b>Unit Testing</b>  <i>(Testing of scenarios between CIS system and MDM/R to ensure that day-to-day processes can be completed to maintain customer service standards &amp; billing performance)</i></p>	<p>May 20, 2011</p>	<p>Information has been sent to the MDM/R on May 12, 2011. Wellington North Power is currently waiting for confirmation that this evidence meets the MDM/R required expectations</p>
<p><b>System Integrity Testing</b>  <i>(Testing by Wellington North Power Inc. to ensure all interfaces between the Customer Information System (Harris) and Meter Data Mgmt/Repository that are required by the meter to bill lifecycle can be performed)</i></p>	<p>June 17, 2011</p>	<p>Once MDM/R approves Wellington North Power Inc.’s test evidence, MDM/R require “2 weeks” to create a System Integrity testing environment for Wellington North power Inc. to use.</p> <p><i>(Note: 2 weeks is an indicated timescale provided by the MDM/R and is dependent upon MDM/R priorities.)</i></p> <p>It will take 2 weeks for Wellington North Power Inc. to perform System Integrity Testing</p>

**Response to question (c) continued:**

<p><b>Qualification Testing</b>  <i>(Testing by Wellington North Power Inc. to ensure business processes can support the meter to bill process, i.e. end-to-end testing)</i></p>	<p>July 15, 2011</p>	<p>Qualification testing will take 26 calendar days to complete.</p> <p>This can only commence after System Integrity Testing has been completed</p>
<p><b>Self Certification</b>  <i>(Authorized signed-off of end-to-end processes and system interfaces by Wellington North Power Inc.)</i></p>	<p>July 29, 2011</p>	<p>Self-certification to ensure that day-to-day business processes can perform in accordance with TOU billing will take 2 weeks to document revised day-to-day processes</p>
<p><b>Transition to Production</b>  <i>(Movement of processes &amp; system functionality into Wellington North Power Inc 'live' activities to enable Time-of Use billing.)</i></p>	<p>September 12, 2011</p>	<p>Ensure three monthly cycles for billing can be tested in the Production environment before moving to TOU billing.</p> <p>From September 12, 2011 to December 31, 2011, Wellington North Power will continue to bill customers using periodic calendar consumption data received from MDM/R. This will ensure that systems and daily processes continue to operate smoothly. Wellington North Power Inc. will request MDM/R to provide consumption data in TOU determinants in effect from January 1, 2012</p>
<p><b>Time-of-Use Billing</b></p>	<p>February 20, 2012</p>	<p>Wellington North Power Inc.'s Time-of-Use bills posted to customers.</p> <p>These electricity bills will reflect the consumption period of 1<sup>st</sup> January 2012 to 31<sup>st</sup> January 2012 (inclusive)</p>

Table 2

**Question (d):**

**Please provide the details of Wellington North's proposed TOU billing implementation schedule, 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.**

**Response from Wellington North Power Inc. to question (d)**

In addition to the timeline summarized in table 2, in response to question (c),

- a. Wellington North Power Inc. has 5 billing cycles for Residential and General Services <50kW customers (cycles 3,4,5,7 and 1).

These 5 billing cycles have the same meter read dates, namely midnight from the 1<sup>st</sup> day of each month to midnight on the last day of each month.

- b. The actual billing date reflects the availability of the IESO Hourly Ontario Electricity Pricing, which is on or about the 20<sup>th</sup> of each calendar month. Wellington North Power Inc. is proposing in its application to defer the TOU billing implementation date to 1<sup>st</sup> January 2012, Therefore, Residential and General Services <50kW customers first Time-of-Use electricity bill would:

- Reflect consumption recorded between 1<sup>st</sup> January 2012 and 31<sup>st</sup> January 2012;
- Be posted on 20<sup>th</sup> February 2012

**Question (e):**

**Please provide details and timelines regarding Wellington North's CIS system complications, including timelines about when problems were identified and when they were (or will be) addressed.**

**Response from Wellington North Power Inc. to question (e)**

Wellington North Power Inc. CIS system is Harris (version 6.3.1). Details of issues that have been encountered are:

- As reiterated in Question (b) (page 4), before registering Smart Meters with the MDM/R, Wellington North Power Inc. completed the installation and training of a new billing system in October of 2010. Since then a number of critical issues developed, requiring our vendor to complete a number of patches to the system. Once patches were installed, testing of the billing system was initiated and continued to early November, 2010. In early February, 2011 after the installation of a patch, a major problem occurred (i.e. during the customer Pre-Authorized payment file creation, the system reversed the transactions and debited Wellington North Power's bank account and paid the funds into the customer's bank accounts. All customers had to be personally notified before corrections could be made and this required additional resources).
- During Unit Testing in April 2011, it was identified that Harris (v 6.3.1) software did not populate dates when sending data files to MDM/R. As part of TOU billing requirements time/date-stamps are mandatory.

Consequently, Harris (v 6.3.1) needed an upgrade to ensure that data-flows sent to MDM/R were time/date-stamped.

This software upgrade was completed on April 20<sup>th</sup>, 2011 and Wellington North Power Inc. re-started Unit Testing on April 25<sup>th</sup>, 2011 (note, Unit Testing was started from Step 1).

Wellington North Power Inc was reliant upon:

- MDM/R to clear all files that had been sent from Wellington North Power Inc. as part of Unit Testing. The MDM/R staff have been very supportive and agreed with Wellington North Power Inc. that Unit Testing should be started from Step 1.
- Harris to refresh the data held within the Harris CIS system.



**Question (f):**

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

**Response from Wellington North Power Inc. to question (f)**

Wellington North Power Inc. believes that the following factors need to be taken into consideration:

- Acceptance by the MDM/R of Wellington North Power Inc.'s Unit Test evidence (submitted to SME on May 12, 2011).
- Acceptance by MDM/R of the revised project plan dates that Wellington North Power Inc. has submitted to the designated Project Manager – revised project plan submitted on May 19<sup>th</sup>, 2011.
- MDM/R's ability to create a System Integrity testing environment within it's' schedule (approximately 2 weeks after Unit Test evidence has been approved). Should this 2 week period be delays, then the subsequent testing by Wellington North Power Inc. could also be delayed.
- As mentioned in Wellington North Power Inc.'s response to question (b), point number 5, (page 4) Wellington North Power Inc.'s is a small LDC and has committed 2 staff to completing testing and implementing TOU billing. There is a potential risk of absenteeism (sickness) or vacation dates that could result in slippage to TOU billing implementation.