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Commission de l'énergie de l'Ontario
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May 30, 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: Midland Power Utility Corporation – Extension to Mandated Time-of-Use Pricing Date for Regulated Price Plan Consumers
Board File No.: EB-2011-0133**

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
Advisor, Licence Applications

Attachment

Board Staff Interrogatories
Application for Extension to Mandated Time-of-Use Pricing Date
for Regulated Price Plan Customers
Midland Power Utility Corporation
EB-2011-0133
Dated May 30, 2011

Board Staff question 1

Preamble

Midland Power Utility Corporation (“Midland”) filed an application dated May 4, 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 its GS<50kW Regulated Price Plan (“RPP”) consumers.

Under cover of a letter to all Ontario electricity distributors dated August 4, 2010, the Ontario Energy Board provided its determination of mandatory dates by which each distributor must bill those of its RPP customers that have eligible TOU meters using TOU pricing. Midland has applied for an extension to its June 2011 mandated TOU pricing date for its GS>50kW customers and requested a new date of February 2012 for this group of customers. Midland states its “systems are set up to implement TOU rates for these customers,” but an extension is necessary due to “concerns about potential bill increases.”

Midland files monthly reports with the Board on smart meter deployment and TOU pricing.¹ Previous to its May 2011 application, Midland did not indicate it had “concerns about potential bill increases” in its monthly reports, including its report for the month ending March 31, 2011.

On April 19, 2011 the Board released RPP electricity commodity prices that took effect May 1, 2011. The backgrounder accompanying the release of the RPP prices noted that “Though the electricity line on the bill has increased since last May, a comparison of May 2010 and May 2011 shows overall the total bill has remained relatively flat as a result of the introduction of the Ontario Clean Energy Benefit.”²

Questions

- a) Please explain in detail how “concerns about potential bill increases” represent “*extraordinary and unanticipated circumstances*” related to the

¹ See: http://www.ontarioenergyboard.ca/html/touimplementation/toufilings_monthly_read.cfm

² See:

http://www.ontarioenergyboard.ca/OEB/ Documents/Press%20Releases/rpp_Backgrounder_20110419.pdf

implementation of TOU billing for Midland's GS<50kW customer class given that Midland's "systems are set up to implement TOU rates for these customers."

- b) Please explain in detail why Midland did not raise this concern prior to its May 2011 application for an extension.
- c) Please explain in detail why Midland has "concerns about potential bill increases" for its GS<50kW customer class given the presence of the Ontario Clean Energy Benefit.
- d) Please provide a description of all smart meter and TOU communications Midland has issued to its GS<50kW customers over the last two years. Please explain why Midland has failed to provide these customers with materials containing sufficient information to prepare them for TOU implementation.
- e) In the event that Midland does not receive the extension to its mandated TOU implementation date as requested, does Midland plan to work with its GS<50kW customers to implement and educate them on the CDM programs available through the Ontario Power Authority?
- f) Has Midland performed analysis of the bill impact benefits to its GS<50kW customers with the implementation of TOU billing? If so, please provide this analysis. If no such analysis has been conducted, please explain why.
- g) Does Midland intend to inform those customers whose bills would be reduced by TOU billing that Midland has chosen to delay the implementation of TOU billing? If yes, when and how. If not, why not?
- h) Please explain why Midland requires "six months to implement and educate customers on the OPA programs so that customers may mitigate against potential increases".
- i) Please provide the details of Midland's proposed TOU implementation for GS<50 customers, including the specific dates customers will be converted to TOU billing and how many customers will be converted on each date.