

***Greater Sudbury Hydro Inc./
Hydro du Grand Sudbury Inc.***

500 Regent Street / rue Regent, PO Box 250 / CP 250, Sudbury, ON P3E 4P1
Telephone (705)675-7536 Fax (705)671-1413

May 31, 2011

Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
Toronto ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

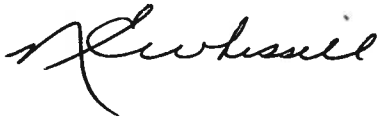
Dear Ms. Walli:

Re: **Greater Sudbury Hydro Inc. – Extension to mandated Time-of-Use Pricing
Date for Regulated Price Plan Consumers
OEB-2011-0105**

Please find attached Greater Sudbury Hydro Inc.'s responses to the Board Staff interrogatories dated May 20, 2011. We apologize for the delay in filing and we request that the submission dates be extended if required in order to provide enough time for submissions to be drafted on the application evidence.

An electronic copy of our responses will be submitted through the OEB e-filing Services and two (2) hard copies are included with this package.

Respectfully submitted,



Nancy Whissell
Vice President – Corporate Services

Enclosures.

Board Staff Interrogatories
Application for Extension to Mandated Time-of-Use Pricing Date for
Regulated Price Plan Consumers
Greater Sudbury Hydro Inc.
EB-2011-0105
Dated May 20, 2011

Board Staff question 1

Preamble

Greater Sudbury Hydro Inc. ("Greater Sudbury Hydro") filed an application dated April 12, 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.

Greater Sudbury Hydro has applied for an extension to its mandated TOU date of June 2011 and requested a new TOU date of December 2011. Greater Sudbury Hydro states the extension is necessary as a result of delays experienced implementing a new advanced metering infrastructure and new customer information billing system. Greater Sudbury Hydro is also requesting direction from the Board in regards to inaccessible meters where property owners either refuse to allow access or keep an appointment for a meter change.

Questions

Please confirm the status of Greater Sudbury Hydro's smart meter deployment and TOU implementation as of May 1, 2011.

As of May 1, 2011 Greater Sudbury Hydro has installed 41,966 residential smart meters within the Greater Sudbury Hydro service territory.

As of May 1, 2011 Greater Sudbury Hydro has installed 2,384 small commercial smart meters within the Greater Sudbury Hydro service territory.

Our AMI Network Operator continues to work to optimize the performance of the AMI Network with a focus on specific areas of the Greater Sudbury Hydro service territory where there are communication issues with the head end system. The stabilization of this network is critical to ensuring that Greater Sudbury Hydro has billing ready data.

As of May 1, 2011 Greater Sudbury Hydro is billing no registered customers on TOU rates. We are, however, billing 54 customers who have installed ETS heaters as part of the Third Tranche funding mechanism. As a condition of the OEB's approval of the program we were to offer TOU billing on this exception basis.

Please provide the details of Greater Sudbury's proposed TOU billing implementation schedule and when customers will be billed on a TOU basis. Including:

- i. billing cycle dates;
- ii. number of customers on each billing date;

Please see the attached billing schedules for December 2011 through March 2012 that show billing cycle dates and customer numbers as requested.

Please provide the details of the “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).”

The "Arrears Management Program" (AMP) introduced significant changes to our CIS, so much so that our CIS vendor held information gathering sessions over several months to determine how exactly to make these changes. In the end, it was decided that a new 'Service' was required to track the arrears for a customer who was granted AMP status. There is a new 'branch patch' available plus customized installation, training and support available from our vendor for the implementation of this new programming. We have contracted with our vendor for this offering, and the branch patch has been applied to our test environment. We anticipate this testing to start by June 6, 2011 and be completed by June 17, 2011 barring any major hurdles. It is never a good idea to introduce new programming and configuration changes to an environment that is not stable, and that is why we have held off on this particular component. We are manually working the arrears currently in order to be compliant with regulation.

As well, with changes required for notices and more extensive monitoring of dates for cutoff and collection trips and a 21 day tickler, the collections process is taking more effort to manage and work processes have had to be modified. We are still working through these changes.

Please provide the details and status of Greater Sudbury’s new CIS system and how the new system has impeded Greater Sudbury’s TOU implementation schedule. Include timelines regarding when problems occurred and when they were (or will be) addressed.

GSU went live with a new CIS on November 8, 2010. All available resources have been dedicated to this project since go live. As with all new system implementations, there were challenges to overcome:

- call processing took much longer due to unfamiliarity with the system
- billing was behind schedule due to bill print issues and unfamiliarity with the system
- system problems were logged with the vendor on a daily basis

Billing returned to an 'on schedule' status in March 2011, at which point we implemented the collections component. There have been a number of significant problems with collections that the vendor is still working on today. We are still manually reviewing, and correcting

collection trips and disconnect orders. Without the collections component active, we were unable to perform any of the unit tests involving disconnects/reconnects.

Budget billing reconciliation is scheduled for July-August 2011, however, configuration and bill print design has yet to be completed and tested.

We anticipated a 6 month stabilization period, which would bring us to May 2011. There will be a further 6 month period before we reach 'steady state'. 'Steady State' is defined primarily by the volume of support issues logged with the vendor.

All available CIS resources have been dedicated to the new CIS implementation up to this point. We have freed up some CIS resources to participate in the ieso test process going forward, with the restart of unit testing with the ieso scheduled for the week ending June 3rd.

Are there any other factors (internal and/or external) that Greater Sudbury Hydro has identified that may hinder its ability to comply with its requested mandated TOU pricing date?

Meter Availability – After a successful pilot with the Sensus AMI, Greater Sudbury Hydro Inc. entered into a contract with Sensus for full deployment of an AMI system in late January 2010. Meters were ordered and installation began in April 2010. A contractor, Olameter, was hired for the mass deployment. In September 2010, Sensus informed GSHI that the Icon X three phase meter had “significant” production problems and Sensus was cancelling the program and recommending that customers order the Elster A3RD or A3RL. GSHI, working with KTI Sensus, immediately ordered the Elster A3RL meter in the ANSI 16S (1300 units) and 9S (100 units) formats, and 100 Flexnet modules for the GE KV2C meter which was recommended for use in the 100 or so 600 volt delta services still found in the GSHI service territory.

The Elster A3RL meters arrived in October and Olameter began installation. After installing over 400 of the 16S meters we were informed in November 2010 by KTI that the A3RL was not programmed to meet the requirements of the Provincial AMI Specification. Exchanges of information to help define who said what, when and negotiations on cost sharing the reprogramming and were extensive and involved GSHI, KTI Sensus and Elster staff. After a lengthy process, KTI and GSHI agreed upon cost sharing and the 900 - 16S meters in stock were recently returned for reprogramming. The 9S meters were neither programmed nor shipped as the negotiations on the 16S dragged on. All Elster meters, not currently in service are expected back in early July. At that time the remaining 400+ Elster A3RL meters with incorrect programming will have to be removed from the field, sent back for programming and resealing, returned and reinstalled. GSHI expects this work to be completed by early November.

The General Electric KV2C meters have not yet arrived and we are unable to install Smart Meters on the 100 delta connected GS<50 customer until they arrive. The manufacturer

has not provided a deliver date. We do not have any definitive completion date for these Smart Meter installations.

The A3RL transformer rated meters (ANSI Form 9S) for GS<50 customers, of which there are about 100, require extensive revisions at each customers site. Customers having this type of meter have historically been metered using a 2-1/2 element meter scheme. Measurement Canada requires 3 element metering on all new installations. GSHI therefore ordered all 9S meters as 3 element meters. The retrofit on existing installations will take time as appointments and outages at each customer will be required. GSHI expects to be completed by early November.

In addition, about 50 or so existing inside 2S - 120/240 volt single phase A-Base meter installations are unsuitable for S base adapters, due to obstacles such as other disconnect switches and "pony" panels. GSHI must engage an electrical contractor to move the obstacles. This requires coordination with the customer and the contractor, at night or on weekends as the meter is inaccessible.

Please provide details on Greater Sudbury Hydro's plan, including timelines and action taken, to reach the approximately 600 inaccessible meter customers and transition them onto TOU pricing.

When Olameter finished installing about 43,000 Smart Meters late last October, there had been about 1500 declared uninstalleable meters. Olameter was contracted to attempt to install every meter. If they could not get access to the meter, because it was inside an unattended building or inside a locked fence, the Olameter call center attempted to contact the customer three times by phone. After completing this process the meter was declared "uninstalleable" by Olameter and turned over to GSHI for further attempts. GSHI had been contacting "uninstalleable" customers over the April to October period and had cleared a number of "uninstallables".

However, we were unable to contact significant numbers of customers by telephone during normal business hours, so GSHI adopted a strategy used by Sault Sainte Marie PUC. Meter technicians were given lists of uninstalleable meter locations and made "cold calls" on customers during the evening hours in an attempt to get the Smart Meter installed. The Meter Technicians was required to leave the enclosed letter (see attachment) when no one was home or if the person they talked to refused them. The letter asked the customer to contact GSHI to arrange an appointment for the Smart Meter installation. Within three weeks of leaving a letter on site about 50% of the uninstallables called and made arrangements. We are pleased to report that we currently have about 250 uninstalleable meters outstanding. Of these, we have received 11 flat out refusals to allow us access to change the meter and 8 others require contractor work to upgrade the existing A base as the adapter could not be installed due to obstructions.

We plan to continue the “drive by” strategy as long as possible. However, we are seeking guidance from the OEB on whether or not to proceed to disconnection for those customers who refuse access to our Meter technicians and those who refuse to communicate with us.

| December 2011 (Month 2) | |
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| Cycle | Electric Meters | Water Meters | Total Accounts | Area | Sched Read Date | DCO Date | Biller | Status | Date | Sched Bill Date | Actual | Late | Due | Inserts |
|---|-----------------|--------------|----------------|--------------------------------|-----------------|----------|--------|--------|------|-----------------|--------|-------|-----|--|
| 31 | 963 | 829 | 1029 | Capreol/New Sudbury | 12/1 | | | | | 12/16 | | ##### | | Start:TOU starts now, reflected on next bill |
| 32 | 973 | 526 | 1005 | New Sudbury | 12/2 | | | | | 12/19 | | ##### | | |
| 33 | 1067 | 786 | 1099 | New Sudbury | 12/3 | | | | | 12/19 | | ##### | | |
| 34 | 1128 | 790 | 1166 | New Sudbury | 12/4 | | | | | 12/19 | | ##### | | |
| 35 | 951 | 718 | 1010 | New Sudbury | 12/5 | | | | | 12/20 | | ##### | | |
| 36 | 912 | 712 | 1001 | New Sudbury | 12/6 | | | | | 12/21 | | ##### | | |
| 37 | 1159 | 1197 | 1195 | New Sudbury | 12/7 | | | | | 12/22 | | ##### | | |
| 38 | 1130 | 804 | 1226 | New Sudbury | 12/8 | | | | | 12/28 | | ##### | | |
| 39 | 1057 | 892 | 1160 | New Sudbury | 12/9 | | | | | 12/28 | | ##### | | |
| 40 | 878 | 755 | 968 | New Sudbury | 12/10 | | | | | 1/3 | | ##### | | |
| 41 | 0 | 1389 | 1410 | Garson | 12/11 | | | | | 1/3 | | ##### | | |
| 42 | 0 | 1055 | 1070 | Garson | 12/12 | | | | | 1/3 | | ##### | | |
| 43 | 1228 | 1078 | 1336 | Falconbridge/Coniston | 12/13 | | | | | 1/4 | | ##### | | |
| 44 | 0 | 458 | 467 | Wahnapiatae | 12/14 | | | | | 1/4 | | ##### | | |
| 90 | 476 | 378 | 577 | GS>50 ('old' Cycle 20) | 12/15 | | | | | 1/4 | | ##### | | |
| 92 | 37 | 0 | 36 | West Nipissing (>50 only) | 12/15 | | | | | 1/5 | | ##### | | |
| 45 | 1139 | 0 | 1157 | Cache Bay/West Nip | 12/15 | | | | | 1/5 | | ##### | | |
| 46 | 1199 | 0 | 1215 | West Nipissing | 12/16 | | | | | 1/5 | | ##### | | |
| 47 | 831 | 0 | 838 | West Nip | 12/17 | | | | | 1/6 | | ##### | | |
| 48 | 1315 | 1192 | 1362 | Minnow Lk | 12/18 | | | | | 1/6 | | ##### | | |
| 49 | 885 | 606 | 967 | Minnow Lk/S Kingsway | 12/19 | | | | | 1/6 | | ##### | | |
| 50 | 1067 | 785 | 1134 | Minnow Lk | 12/20 | | | | | 1/9 | | ##### | | |
| 51 | 1101 | 786 | 1194 | Minnow Lk/S Kingsway | 12/21 | | | | | 1/9 | | ##### | | |
| 52 | 1078 | 604 | 1159 | Minnow/Donovan/Dntwn | 12/22 | | | | | 1/9 | | ##### | | |
| 53 | 980 | 784 | 1002 | Downtn/S End/Broder | 12/23 | | | | | 1/10 | | ##### | | |
| 54 | 1065 | 422 | 1171 | Downtn/N Kingsway | 12/24 | | | | | 1/10 | | ##### | | |
| 55 | 529 | 316 | 585 | Donovan/Downtn | 12/25 | | | | | 1/10 | | ##### | | |
| 56 | 1017 | 471 | 1094 | Downtn/West End | 12/26 | | | | | 1/10 | | ##### | | |
| 57 | 1022 | 583 | 1087 | West End | 12/27 | | | | | 1/11 | | ##### | | |
| 58 | 1301 | 705 | 1334 | W End/Hosp/S End/Broder | 12/28 | | | | | 1/12 | | ##### | | |
| 59 | 1259 | 455 | 1305 | S End/Broder | 12/29 | | | | | 1/13 | | ##### | | |
| 60 | 405 | 1 | 471 | old' Cycle 97 (non-metered) | 12/30 | | | | | 1/14 | | ##### | | |
| | 28152 | 20077 | 32830 | | | | | | | | | 0 | | |
| | 46750 | 46670 | 69256 | | | | | | | | | 0 | | |
| | | | | | | | | | | | | 0 | | |
| 91 | 47 | | 47 | Interval (Rt 310 & 311) | 1/1 | | | | | | | 0 | | |
| 91 | 0 | | 1 | Streetlights (Rt 312) | 1/1 | | | | | | | 0 | | |
| 94 | 5 | | 4 | Interval West Nip (Rt 307) | 1/1 | | | | | | | 0 | | |
| 94 | 0 | | 1 | Streetlights West Nip (Rt 308) | 1/1 | | | | | | | 0 | | |
| 98 | 0 | | 192 | Sentinel Light (342) | 1/1 | | | | | | | 0 | | |
| | | | | | | | | | | | | | | |
| DCI is - 3 working days from scheduled read Date | | | | | | | | | | | | | | |
| Pricing is + 10 working days after DCO date (read date) | | | | | | | | | | | | | | |
| Sched Bill Date is + 10 working days from Sched Read Date | | | | | | | | | | | | | | |

February 2012 (Month 2)

| Cycle | Electric Meters | Water Meters | Total Accounts | Area | Sched Read Date | DCO Date | Bill | Status | Date | Sched Bill Date | Actual | Late | Due | Inserts |
|---|-----------------|--------------|----------------|--------------------------------|-----------------|----------|------|--------|------|-----------------|--------|------|-----|-------------------------|
| 31 | 963 | 829 | 1029 | Capreol/New Sudbury | 2/1 | | | | | 2/16 | | #### | | Start:First TOU invoice |
| 32 | 973 | 526 | 1005 | New Sudbury | 2/2 | | | | | 2/17 | | #### | | |
| 33 | 1067 | 786 | 1099 | New Sudbury | 2/3 | | | | | 2/20 | | #### | | |
| 34 | 1128 | 790 | 1166 | New Sudbury | 2/4 | | | | | 2/20 | | #### | | |
| 35 | 951 | 718 | 1010 | New Sudbury | 2/5 | | | | | 2/20 | | #### | | |
| 36 | 912 | 712 | 1001 | New Sudbury | 2/6 | | | | | 2/21 | | #### | | |
| 37 | 1159 | 1197 | 1195 | New Sudbury | 2/7 | | | | | 2/22 | | #### | | |
| 38 | 1130 | 804 | 1226 | New Sudbury | 2/8 | | | | | 2/23 | | #### | | |
| 39 | 1057 | 892 | 1160 | New Sudbury | 2/9 | | | | | 2/24 | | #### | | |
| 40 | 878 | 755 | 968 | New Sudbury | 2/10 | | | | | 2/27 | | #### | | |
| 41 | 0 | 1389 | 1410 | Garson | 2/11 | | | | | 2/27 | | #### | | |
| 42 | 0 | 1055 | 1070 | Garson | 2/12 | | | | | 2/27 | | #### | | |
| 43 | 1228 | 1078 | 1336 | Falconbridge/Coniston | 2/13 | | | | | 2/28 | | #### | | |
| 44 | 0 | 458 | 467 | Wahnapiatae | 2/14 | | | | | 2/29 | | #### | | |
| 90 | 476 | 378 | 577 | GS>50 ('old' Cycle 20) | 2/15 | | | | | 3/1 | | #### | | |
| 92 | 37 | 0 | 36 | West Nipissing (>50 only) | 2/15 | | | | | 3/1 | | #### | | |
| 45 | 1139 | 0 | 1157 | Cache Bay/West Nip | 2/15 | | | | | 3/1 | | #### | | |
| 46 | 1199 | 0 | 1215 | West Nipissing | 2/16 | | | | | 3/2 | | #### | | |
| 47 | 831 | 0 | 838 | West Nip | 2/17 | | | | | 3/5 | | #### | | |
| 48 | 1315 | 1192 | 1362 | Minnow Lk | 2/18 | | | | | 3/5 | | #### | | |
| 49 | 885 | 606 | 967 | Minnow Lk/S Kingsway | 2/19 | | | | | 3/5 | | #### | | |
| 50 | 1067 | 785 | 1134 | Minnow Lk | 2/20 | | | | | 3/6 | | #### | | |
| 51 | 1101 | 786 | 1194 | Minnow Lk/S Kingsway | 2/21 | | | | | 3/7 | | #### | | |
| 52 | 1078 | 604 | 1159 | Minnow/Donovan/Dntwn | 2/22 | | | | | 3/8 | | #### | | |
| 53 | 980 | 784 | 1002 | Downtn/S End/Broder | 2/23 | | | | | 3/9 | | #### | | |
| 54 | 1065 | 422 | 1171 | Downtn/N Kingsway | 2/24 | | | | | 3/12 | | #### | | |
| 55 | 529 | 316 | 585 | Donovan/Downtn | 2/25 | | | | | 3/12 | | #### | | |
| 56 | 1017 | 471 | 1094 | Downtn/West End | 2/26 | | | | | 3/12 | | #### | | |
| 57 | 1022 | 583 | 1087 | West End | 2/27 | | | | | 3/13 | | #### | | |
| 58 | 1301 | 705 | 1334 | W End/Hosp/S End/Broder | 2/28 | | | | | 3/14 | | #### | | |
| 59 | 1259 | 455 | 1305 | S End/Broder | 2/29 | | | | | 3/15 | | #### | | |
| 60 | 405 | 1 | 471 | old' Cycle 97 (non-metered) | 2/29 | | | | | 3/15 | | #### | | |
| | 28152 | 20077 | 32830 | | | | | | | | | 0 | | |
| | 47274 | 46670 | 69256 | | | | | | | | | 0 | | |
| | | | | | | | | | | | | 0 | | |
| 91 | 47 | | 47 | Interval (Rt 310 & 311) | 3/1 | | | | | | | 0 | | |
| 91 | 0 | | 1 | Streetlights (Rt 312) | 3/1 | | | | | | | 0 | | |
| 94 | 5 | | 4 | Interval West Nip (Rt 307) | 3/1 | | | | | | | 0 | | |
| 94 | 0 | | 1 | Streetlights West Nip (Rt 308) | 3/1 | | | | | | | 0 | | |
| 98 | 0 | | 192 | Sentinel Light (342) | 3/1 | | | | | | | 0 | | |
| | | | | | | | | | | | | | | |
| DCI is - 3 working days from scheduled read Date | | | | | | | | | | | | | | |
| Pricing is + 10 working days after DCO date (read date) | | | | | | | | | | | | | | |
| Sched Bill Date is + 10 working days from Sched Read Date | | | | | | | | | | | | | | |

[illegible][illegible]

DATE

Customer Name
Customer Address

Dear Customer:

When our installation team was in your neighborhood installing smart meters on behalf of Greater Sudbury Utilities, we could not gain access to our electricity meter to exchange your current electricity meter to a new smart electricity meter. The provincial government has mandated installing a smart electricity meter in every Ontario home by December 31, 2010. Information regarding the Ontario Smart Meter Initiative can be found on the Ministry of Energy and Infrastructure's website at www.Ontario.ca/powersmarter.

As per the Ontario Energy Board Distribution System Code, Greater Sudbury Utilities has the right to maintain the electricity meter. Section 5.1.1 states that a Distributor shall provide, install and maintain a meter installation for each customer connected to the distributor's distribution system. The Distribution System Code can be found on the Ontario Energy Board's website (www.oeb.gov.on.ca).

In order to accommodate the Ontario Ministry of Energy and Infrastructure's mandate for smart electricity meters, we will need to change your meter. When we change your meter, your power will be shut off for a short period while we remove the current meter and replace it with the new smart meter. Once the power comes back on, you may need to reset some of your digital clocks.

For now, your new meter will continue to work just like your current one. Please be aware that there will be no immediate change to your electricity rates or billing.

We will ensure you are kept up to date and informed in advance of any billing changes. If you should have any questions, please don't hesitate to contact our customer service department at 705-675-7536. We will be sending out our field service technicians to change your meter. If there is a preferred time for us to gain access to the electricity meter please let us know and we will make the appropriate arrangements to have someone out there to complete the work. We thank you for your cooperation.

Regards,