



Wellington North Power Inc.

290 Queen Street West, PO Box 359, Mount Forest, ON N0G 2L0
Phone: 519.323.1710 Fax: 519 323 2425 Email: wnp@wellingtonnorthpower.com

www.wellingtonnorthpower.com

June 6, 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: Wellington North Power Inc. – Ontario Energy Board Licence ED-2002-0511
Response to Board Staff Submission - Regarding the Application for an
Extension to its Mandated Time-of-Use Pricing Date for Regulated Price Plan Consumers
Board File No. EB-2011-0114**

As directed in the April 28, 2011 Notice of Application and Written Hearing, please find enclosed Wellington North Power Inc. response to the Board Staff Submission dated May 27, 2011. The submission is requesting additional information to the Interrogatory response provided for Question b) #3.

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

Yours truly,

Judy Rosebrugh, President & CEO
Wellington North Power Inc.
Phone: 519-323-1710
Fax: 519-323-2425
Cell: 519-261-171

**Response to Board Staff May 27, 2011 Submission
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**

On April 15, 2011 Wellington North Power Inc. submitted an application with the Ontario Energy Board for a licence amendment granting an extension in the relation to the mandated date for the implementation of Time-of-Use ("TOU") pricing rates for Regulated Price Plan consumers.

Wellington North Power Inc. applied for an extension to its mandated June 2011 TOU pricing date and requested a new TOU pricing date of January 2012. Wellington North Power stated the extension is necessary due to complications arising from implementing customer information system conversion.

The Ontario Energy Board issued a Notice of Application and Hearing on April 28, 2011. Board staff filed interrogatories on the application on May 12, 2011. Wellington North Power Inc. responded to the interrogatories on May 19, 2011.

Following the review of the application and evidence filed in the proceeding, Board staff stated there is no issue with Wellington North Power Inc.'s request.

Board Staff Submission:

Board staff does note that from interrogatory response Question b) # 3 Wellington North's self-certification was deemed incomplete by the MDM/R. Board staff requests that Wellington North in its reply submission indicate why test results were deemed incomplete, what steps have been taken to ensure the acceptance of the test results and as the next date for testing was May 20, 2011, what the results of this test were.

**Board Staff Question (b) #3
Interrogatory 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.

Wellington North Power Inc.'s response to Interrogatory Question (b), point 3:

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 3rd 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 25th 2011 and is scheduled to be completed on May 20, 2011. (This will be reflected in the June 10th 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.

Response from Wellington North Power Inc. to Board staff request:

(1) Why tests results were deemed incomplete:

Wellington North Power Inc. initially completed Unit Testing on April 7, 2011, however the test evidence was rejected by MDM/R as it was deemed as incomplete. It was deemed as incomplete on the basis of:

- MDM/R requested that testing should be undertaken by an LDC and not a third party, so that an LDC's resources (people and systems) would be sufficiently trained and systems could manage daily activities. The initial testing was performed by a third party, who did not complete many of the required tests.
- At that time, certain items identified in the test plan could not be tested in Wellington North Power Inc.'s Customer Information System (Harris) system due to technical and/or configuration restrictions. Items that could not be tested due to system limitations, at that particular time, included:

- a) Time-stamp field – this was not a user edit-able field. A user could access the raw files and manipulate the data however this would cause a mismatch between data held in MDM/R and the Harris system. As part of TOU billing requirements, time/date stamps are mandatory as a data field exchange between MDM/R and the LDC's customer information system;
- b) Billing Quantity Request was not retrieving the correct data to perform a meter exchange;
- c) **Appendix A** contains an e-mail from MDM/R outlining the technical issues identified by their staff with the test evidence submitted by Wellington North Power Inc. from the initial testing undertaken with the assistance of the third party.

The statement "please review the Spreadsheet and the supporting data that you have provided and resend a complete package" confirms that re-testing and re-submitting of test evidence by Wellington North Power Inc. was required;

- d) Work around-solutions for the above two issues identified in (a) and (b) above were proposed by the third party. However, Wellington North Power Inc. users rejected these proposals as:
 - Lack of confidence that these "work-arounds" were sustainable once TOU billing was implemented;
 - These "work-arounds" did not reflect the company's daily core processes.
- Consequently, system patches were required for the Harris North Star system to ensure that the software was configured correctly to fulfill the test requirements. The software upgrade was completed on April 20th, 2011.

(2) What steps have been taken to ensure the acceptance of the test results:

Wellington North Power Inc. has taken the following measures to ensure that test results from the re-testing are accepted by the Meter Data Management Repository:

- As instructed by MDM/R staff, Wellington North Power Inc. is undertaking the testing internally and not using a third party. This has ensured that Wellington North Power Inc. is completely accountable for the testing and the test results, as well as ensuring that internal processes and systems are correct and any customer information system issues are resolved in a controlled manner.
- The Harris North Star CIS issues identified were resolved with “patches” and an upgrade was made available to Wellington North Power Inc. The software upgrade was completed on April 20th and Wellington North Power Inc. started Unit Testing on April 25th, 2011. Testing from Step 1 to ensure that there were no further system issues or complications with upstream or downstream processes.
- Wellington North Power Inc. allocated two full-time staff to this project, of which one resource is dedicated to completing all the relevant scenario testing and evidence submissions to the MDM/R. This has ensured that testing accurately reflects the core activities performed by Wellington North Power Inc.
- Wellington North Power Inc. has formed an excellent working relationship with the MDM/R Project Manager, enabling the company to fully understand the expectations of the MDM/R environment, as well as seek guidance to overcome issues and prevent delays.
- By undertaking the testing internally, Wellington North Power Inc. has been able to apply a “hands-on” approach including learning from errors and seeking solutions when issues arise. This coupled with the excellent assistance of the MDM/R Project Manager and Operating Data Services has increased Wellington North power Inc. understanding of the process.
- Additionally, Wellington North Power Inc has formed good relationships with other utilities that are completing or have completed testing. Sharing knowledge and experience has also improved Wellington North Power Inc.’s understanding of systems and processes required to ensure successful completion of transactions and functionality with the Meter Data Management Repository.
- In its application, Wellington North Power Inc. is proposing to defer the TOU billing implementation date to 1st January 2012. Therefore, Residential and General Services <50kW customers first Time-of-Use electricity bill would reflect consumption recorded between January 1 - 31 2012 and be posted on 20th February 2012. As per project plan agreed with MDM/R and Wellington North Power Inc, the “*Transition to Production*” date is September 12th, 2011. Wellington North Power Inc. will use the period from September 2011 to December 2011 (i.e. 3 monthly billing cycles) to make any amendments to processes, train & educate co-workers and to address any data and/or system configuration issues. This will ensure that exceptional customer services standards are maintained and that there is a seamless transition to TOU billing from January 2012.

(3) Results of the testing (testing completed May 20, 2011):

Unit Testing (*testing of scenarios between CIS system and MDM/R to ensure that day-to-day processes can be completed to maintain customer service standards and billing performance*) was completed on May 20th, 2011 as per the monthly "Smart Meter Time of Use" report filed with the Ontario Energy Board in April 2011.

- Information was sent to the MDM/R on May 12, 2011, illustrating the Wellington North Power Inc.'s test evidence;
- A response from the MDM/R Project Manager was received by Wellington North Power Inc. on May 16th, 2011, stating that the Unit test evidence submitted has been validated by MDM/R staff (i.e. test evidence output from Wellington North Power Inc. has passed MDM/R's acceptance criteria.)

A copy of this e-mail is shown in **Appendix B** (Note the SME Form 0007 (Self Certification) has been submitted as requested by the MDM/R)

- Furthermore, Wellington North Power received an e-mail from MDM/R on May 19th, 2011 advising that Wellington North Power has progressed to the next stage of testing, System Integrity Testing, and the company is included in the next wave assignment commencing June 6th, 2011. System Integrity Testing is planned to take 2 weeks.
(System Integrity Testing – *testing by Wellington North Power Inc. to ensure all interfaces between the Customer Information Systems (Harris North Star) and Meter Data Management Repository that are required by the meter to bill lifecycle can be performed*)

A copy of this e-mail is shown in **Appendix C**

Appendices:

Appendix A:

Below is a copy of e-mail from MDM/R summarizing the technical issues identified by MDM/R with the initial test evidence submitted by Wellington North Power Inc. resulting in re-testing and a re-submission of test evidence.

From: Reliszko, Mae [<mailto:Mae.Reliszko@ieso.ca>]
Sent: Monday, April 11, 2011 3:12 PM
To: jrosebrugh@wellingtonnorthpower.com
Cc: Murphy James
Subject: RE: Sync files & responses

Hi Judy,

I am supporting Jim in the review of your Evidence, and I have identified issues with the first two scenarios. For Initial/Final PSync, we did not receive the initial Synchronization if you can please submit Sequence # 1. We are also expecting a Final PSync once you have completed all your tests, this was not included in the package you sent; this sync would have sequence # greater than 74.

For Scenario 2.3.1, you have indicated that this is a meter change however after reviewing the sync file you have only ended the current meter; this has also been confirmed in the IRO6 and GUI. This is likely the reason you cannot produce a billing quantity request. A successful billing quantity response is required; please note that this applies to all Scenarios except for Agent Changes. Also, there are inconsistencies between the Test Scenario details and Test Results.

I also checked the billing quantities responses submitted, the Test results indicated that a successful billing quantity response was received. For tests 2.3.7 and 2.3.8 a transaction status code of '02' was reported, this indicates that there is no data available for the period you have requested.

Lastly, you indicated that the Disconnect was performed using a PSync; changes are to executed using ISync. Psync should only represent current state so there should be no changes reported.

Please review the Spreadsheet and the supporting data that you have provided and resend a complete package.

Regards,

Mae

Mae Reliszko | MDM/R Registration & Enrolment Project Lead | Station A, Box 4474, Toronto, Ontario, M5W 4E5

C: 647.680.1795 | T: 905.855.6105 | F: 905.403.6996 | Email: mae.reliszko@ieso.ca | Web: www.ieso.ca and www.smi-ieso.ca

Appendix B:

Below is a copy of e-mail from MDM/R received by Wellington North Power Inc advising that Unit Test evidence has fulfilled MRMD requirements:

From: Murphy, James [<mailto:James.Murphy@ieso.ca>]
Sent: Monday, May 16, 2011 8:37 AM
To: Judy Rosebrugh
Cc: 'Ruth Allsop'; 'Jessica Golchuk'
Subject: Wellington North Power - Project Plan

Good morning Judy,

Will you be submitting a revised Project Plan?

The Unit Test evidence that Jessica has submitted has been validated. We will also require the SME_FORM_0007 (Self Certification for Enrolment Testing form).

Jim

James Murphy | Registration & Enrolment Project Lead, IESO | Station A, Box 4474, Toronto, Ontario, M5W 4E5

P:905-855-6464 | C:416.993.9105 | F:905.855.6371 | Email: James.Murphy@ieso.ca | mdmr.registration@ieso.ca

Web: www.ieso.ca and www.smi-ieso.ca

Appendix C:

Below is a copy of e-mail from MDM/R received by Wellington North Power Inc. advising that Wellington North Power is included in the next wave assignment.

From: Murphy, James [mailto:James.Murphy@ieso.ca]

Sent: Thursday, May 19, 2011 1:48 PM

To: Judy

Cc: Jessica Golchuk; rallsop@wellingtonnorthpower.com; rbucknall@wellingtonnorthpower.com; Wynn, Jan; Orozco, Luis

Subject: RE: Wellington North Power Inc. - Self Certification, Revised Project Plan

Good afternoon Judy,

Thank you for the re-submission of your Project Plan. We have reviewed your schedule for completeness and accuracy. Your wave assignment for *(June 6, 2011 – August 5, 2011)* has been added to the IESO Wave Assignment Calendar.

If delays in your progress require you to reassess any key enrolment milestones it is imperative that you advise the IESO immediately so we can re-assign your wave assignment.

If future capacity constraints result in a delay to your wave assignment you will be contacted immediately so that we can jointly determine an alternate date that accommodates your requirements and individual constraints.

You can expect to receive a final reconfirmation of your wave assignment after we complete our assessment of your Self-Certification for Enrolment Testing SME_FORM_0007.

Below is your expected enrolment test schedule based on your Project Plan submission.

Enrolment Test Schedule	Start Date
Unit Testing	Ongoing
System Integration Testing (SIT)	June 6, 2011
Qualification Testing (QT)	June 20, 2011
Cut-over	August 5, 2011

Thanks,

Jim

James Murphy | Registration & Enrolment Project Lead, IESO | Station A, Box 4474, Toronto, Ontario, M5W 4E5
P:905-855-6464 | C:416.993.9105 | F:905.855.6371 | Email:James.Murphy@ieso.ca | mdmr.registration@ieso.ca
Web: www.ieso.ca and www.smi-ieso.ca
