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**Commission de l'énergie
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June 21, 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: Burlington Hydro Inc. – Extension to Mandated Time-of-Use Pricing
Date for Regulated Price Plan Consumers
Board File No.: EB-2011-0137**

Please find enclosed Board Staff's 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
Burlington Hydro Inc.
EB-2011-0137
Dated June 21, 2011

Board Staff question 1

Preamble

Burlington Hydro Inc. ("Burlington Hydro") filed an application dated May 9, 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 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. Burlington Hydro has applied for an extension to its July 2011 mandated TOU pricing date and requested a new date of January 2012. Burlington Hydro stated that it has "serious concerns about the LAN's ability to self-heal in the presence of extensive foliage."

On June 7, 2011, Burlington submitted further information to Board, noting that approximately 5400 customers were affected by data transmission problems associated with extensive foliage. The June 7, 2011 letter also stated that Burlington Hydro's application for extension "was substantially premised on expected data transmission problems once the trees in the service area obtained their foliage."

Burlington Hydro files monthly reports with the Board on smart meter deployment and TOU pricing.¹ Previous to its May 9, 2011 application, Burlington Hydro did not indicate it had concerns with either "extensive foliage," including its report for the month ending April 31, 2011. Burlington Hydro's April 31, 2011 report states that it has 63,259 RPP-eligible consumers.

On January 24, 2011 Burlington responded to an information request from Board staff regarding Burlington's progress towards smart meter deployment and TOU implementation.

Burlington's response (attached) stated that "Burlington Hydro does not see any issues that will impact its ability to successfully meet the mandatory TOU dates." Further, the letter stated that "the project team is currently ahead of schedule with planned

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

deliverables and the level of confidence is high that Burlington will be able to meet its Registration and Enrolment dates with the MDM/R as well as TOU pricing.”

Questions

- a) Please explain in detail why Burlington Hydro did not raise this concern in its monthly reports or January 24, 2011 letter, prior to its May 9, 2011 application for an extension.
- b) Please state when Burlington Hydro realized that “the presence of extensive foliage” would detrimentally affect its LAN.
- c) Please explain in detail why Burlington Hydro was not able to foresee this issue and configure its LAN appropriately when it initially installed its LAN.
- d) Please explain in detail Burlington Hydro’s plan for resolving this issue, including timelines.
- e) Please confirm the number of customers affected by this problem and specify their locations in Burlington Hydro’s service territory.
- f) Please explain in detail why Burlington Hydro is requesting an extension for its entire customer base rather than just the part of its service area affected by this problem.
- g) Please confirm whether Burlington Hydro is able to implement TOU pricing for those areas of its service territory not affected by this issue by its current mandatory TOU pricing date of July 2011. If this is possible how many customers would Burlington Hydro be able to implement TOU pricing for?

Board Staff question 2

Preamble

In its application for an extension, Burlington Hydro stated that a delay is required because “significant customer distress is expected when customers are suddenly faced with larger bills resulting, in part, from their lack of experience in managing their electricity consumption in a TOU environment.”

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

Burlington Hydro files monthly reports with the Board on smart meter deployment and TOU pricing.³ Previous to its May 9, 2011 application, Burlington Hydro did not indicate it had concerns regarding “customer distress” in its monthly reports, including its report for the month ending April 31, 2011.

On January 24, 2011 Burlington responded to an information request from Board staff regarding Burlington’s progress towards smart meter deployment and TOU implementation.

Burlington’s response (attached) stated that “Burlington Hydro does not see any issues that will impact its ability to successfully meet the mandatory TOU dates.” Further, the letter stated that “the project team is currently ahead of schedule with planned deliverables and the level of confidence is high that Burlington will be able to meet its Registration and Enrolment dates with the MDM/R as well as TOU pricing.”

Questions

- a) Please explain in detail why Burlington Hydro did not raise this concern in its monthly reports or January 24, 2011 letter, prior to its May 9, 2011 application for an extension.
- b) Please explain in detail how “significant customer distress” from “larger bills resulting, in part, from their lack of experience in managing their electricity consumption in an TOU environment,” represent *extraordinary and unanticipated circumstances*” related to the implementation of TOU billing.
- c) Please explain in detail why Burlington Hydro expects “significant customer distress” for its RPP consumers given the presence of the Ontario Clean Energy Benefit.
- d) Please provide a description of all smart meter and TOU communications Burlington Hydro has issued to its customers over the last two years. Please explain why Burlington Hydro has failed to provide these customers with materials containing sufficient information to prepare them for TOU implementation.
- e) In the event that Burlington Hydro does not receive the extension to its mandated TOU implementation date as requested, does Burlington Hydro plan to work with its customers to educate them on managing their electricity consumption?

² See: http://www.ontarioenergyboard.ca/OEB/Documents/Press%20Releases/rpp_Backgrounder_20110419.pdf

³ See: http://www.ontarioenergyboard.ca/html/touimplementation/toufilings_monthly_read.cfm

- f) Has Burlington Hydro performed analysis of the bill impacts to its 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 Burlington Hydro intend to inform those customers whose bills would be reduced by TOU billing that Burlington Hydro has chosen to delay the implementation of TOU billing? If yes, when and how. If not, why not?
- h) Please explain the contribution of consumer education (in terms of the length of the extension requested) to Burlington Hydro's request for a January 1, 2012 TOU implementation date.
- i) Please provide the details of Burlington Hydro's proposed TOU implementation schedule, including the specific dates customers will be converted to TOU billing and how many customers will be converted on each date.