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July 20, 2011

Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto ON M4P 1E4

Dear Ms. Walli:

**Re: Tillsonburg Hydro Inc. – Extension to Mandated Time-of-Use Pricing
Date for Regulated Price Plan Consumers
Board File No.: EB-2011-0247**

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
Tillsonburg Hydro Inc.
EB-2011-0247
Dated July 20, 2011

Board Staff question 1

Preamble

Tillsonburg Hydro Inc. ("Tillsonburg Hydro") filed an application dated June 21, 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. Tillsonburg Hydro has applied for an extension to its June 2011 mandated TOU pricing date and requested a new date of January 15, 2012.

With respect to TOU implementation progress, Tillsonburg Hydro's extension application states that "Registration with the MDM/R was completed in October 2009. Enrolment Testing was completed in August 2010, System Integration Testing ("SIT") was completed in September 2010 and Qualification Testing ("QT") was completed in October 2010. On October 26, 2010 THI completed the Self-Certification process for transition into the MDM/R Production environment. Transition to Production occurred on November 1, 2010."

Tillsonburg Hydro files monthly reports with the Board on smart meter deployment and TOU pricing.¹ Previous to its June 21, 2011 application, Tillsonburg Hydro did not indicate it had concerns with TOU implementation, including its report for the month ending May 31, 2011.

In its June 21, 2011 application Tillsonburg Hydro states that an extension is required because:

- *Testing and training of staff in our Customer Service and Billing areas needs to be completed.*

Questions

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

- a) Please explain in detail why Tillsonburg Hydro did not raise this concern in its monthly reports prior to filing this application.
- b) Given that Tillsonburg Hydro's mandatory TOU date is June 2011, please explain in detail why it did not file its extension application until June 21, 2011, including copies of documentation (e.g., briefing notes/reports/etc.) regarding the timeline of Tillsonburg Hydro's decision to file an extension application.
- c) Given that Tillsonburg Hydro transitioned to production on November 1, 2010, please explain in detail why it has failed to complete "testing and training of staff in our Customer Service and Billing areas," including copies of documentation (e.g., briefing notes/reports/etc.) of when this issue was identified as a concern with respect to TOU implementation.
- d) Given that Tillsonburg Hydro transitioned to production on November 1, 2010, please explain in detail how Tillsonburg's failure to complete "testing and training of staff in our Customer Service and Billing areas" represents *extraordinary and unanticipated circumstances* related to the implementation of TOU billing.

Board Staff question 2

Preamble

Tillsonburg Hydro files monthly reports with the Board on smart meter deployment and TOU pricing.² Previous to its June 21, 2011 application, Tillsonburg Hydro did not indicate it had concerns with TOU implementation, including its report for the month ending May 31, 2011.

In its June 21, 2011 application Tillsonburg Hydro states that an extension is required because:

- *Other Regulatory requirements, including the implementation of new Customer Service Standards, the Ontario Clean Energy Benefit and new Billing Rates (effective May 1, 2011) have had an impact on TH's project schedule for transitioning to TOU.*

Questions

- a) Please explain in detail why Tillsonburg Hydro did not raise this concern in its monthly reports prior to filing this application.

² See: http://www.ontarioenergyboard.ca/html/touimplementation/toufilings_monthly_read.cfm

- b) Given that Tillsonburg Hydro transitioned to production on November 1, 2010, please explain in detail how these regulatory requirements “have had an impact on THI's project schedule for transitioning to TOU,” including copies of documentation (e.g., briefing notes/reports/etc.) of why and when the other requirements were identified as a concern with respect to TOU implementation.
- c) Given that Tillsonburg Hydro transitioned to production on November 1, 2010, please explain in detail how these other requirements represent *extraordinary and unanticipated circumstances* related to the implementation of TOU billing.

Board Staff question 3

Preamble

Tillsonburg Hydro files monthly reports with the Board on smart meter deployment and TOU pricing.³ Previous to its June 21, 2011 application, Tillsonburg Hydro did not indicate it had concerns with TOU implementation, including its report for the month ending May 31, 2011.

In its June 21, 2011 application Tillsonburg Hydro states that an extension is required because:

- *There are still a number of technology related issues to be resolved. Meter reading communications have improved significantly over the past few months but THI is still working towards achieving the required results. There are still a number of synchronization related issues, between our Customer Information System ("CIS") and the MDM/R to be resolved. All issues have been identified and our CIS Vendor ("Harris") is actively looking into them. Due to other technology related issues our customer web presentment tools are still being developed. It is our plan to have them developed and rolled out to customers at least two months prior to transitioning them to TOU.*

Questions

- a) Please explain in detail why Tillsonburg Hydro did not raise this concern in its monthly reports prior to filing this application.
- b) Given that Tillsonburg Hydro transitioned to production on November 1, 2010, please explain in detail the “technology related issues to be resolved,” including copies of documentation (e.g., briefing notes/reports/etc.) of when

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

these issues were identified, copies of correspondence with Tillsonburg's CIS vendor regarding the issues, the steps Tillsonburg has taken to resolve these issues, and the timelines for resolution.

Board Staff question 4

Preamble

Tillsonburg Hydro files monthly reports with the Board on smart meter deployment and TOU pricing.⁴ Previous to its June 21, 2011 application, Tillsonburg Hydro did not indicate it had concerns with TOU implementation, including its report for the month ending May 31, 2011.

In its June 21, 2011 application Tillsonburg Hydro states that an extension is required because:

- *Customer Education is behind schedule as a result of the previous issues outlined above. Customer web presentment, along with informational meetings and materials are key components to customer education.*

Questions

- a) Please explain in detail why Tillsonburg Hydro did not raise this concern in its monthly reports prior to filing this application.
- b) Please explain in detail how a behind schedule customer education program represents *extraordinary and unanticipated circumstances* related to the implementation of TOU billing.
- c) Please provide a description of all smart meter and TOU communications Tillsonburg Hydro has issued to its customers over the last two years. Please explain why Tillsonburg Hydro has failed to provide these customers with materials containing sufficient information to prepare them for TOU implementation.

⁴ See: http://www.ontarioenergyboard.ca/html/touimplementation/toufilings_monthly_read.cfm