

July 6, 2011

Ms, Kristen Walli, Board Secretary Ontario Energy Board 2300 Yonge Street 26<sup>th</sup> Floor P.O.Box 2319 TORONTO, ON M4P 1E4

Dear Ms. Walli:

## Re: Coopérative Hydro Embrun Inc. Application for an Extension of Mandates Time-of-Use Date

Coopérative Hydro Embrun Inc. applied for an exemption from its mandated TOU date of June 2011 and requested a new date of October, 2011 EB-2010-0372.

The order said "Cooperative Hydro Embrun Inc. distribution license ED-2002-0493, specifically Schedule 3 List of Code Exemption, is amended to include an exemption from the requirement to apply time-of-use pricing by a mandatory date under the Standard Supply service Code for Electricity Distributors. This exemption will expire on October 31, 2011". (EB-2010-0372 Attached-Appendix A)

In the previous application (EB-2010-0372) Cooperative Hydro Embrun Inc. decided it would be in its best interest to coordinate its SME enrollment with Ottawa River Power Corporation's enrollment schedule (October 2011).

In its August 24, 2010 letter, the Board acknowledged that distributors may encounter extraordinary and unanticipated circumstances during the implementation of TOU pricing and impact on the distributor's mandatory TOU date and whether any adjustment in that date may be warranted. While Cooperative Hydro Embrun has made significant progress in meeting this mandatory date, there remain a few issues that have led to delays in the corporation's TOU implementation schedule. Therefore Cooperative Hydro Embrun is respectfully requesting an extension of mandated TOU pricing until January 2012 as has Ottawa River Power Corporation, for reasons of economy, organisation and training. Also find attached, the SME update filing of July 2011(Appendix B).

Cooperative Hydro Embrun has presently deployed 100% of all RPP customers. To date Cooperative Hydro Embrun has completed AMCC Internal Testing (Cooperative Hydro Embrun shares and lease the Ottawa River Power Corporation AMCC), CIS Internal Testing, MDMR Registration and the completion of the Self Certification for Enrolment Testing. As well, Cooperative Hydro Embrun has finished System Integration Testing (SIT) in mid-June and will start Qualification Testing (QT) on July 7, 2011. In order to be successful in implementing TOU pricing the following three items should be completed prior to Self Certification – Cutover:

# 1- Customer Transition to TOU Rates

While Cooperative Hydro Embrun has been preparing its customers for the introduction of TOU rates through published information, public meeting and bills inserts, significant customer distress is expected when customers are suddenly faced with larger bills resulting, in part, from their lack of experience in managing electricity consumption in a TOU environment. A period covering a number of billing cycles is essential to enable Cooperative Hydro Embrun to work with its customers to adapt to the new billing reality. Cooperative Hydro Embrun plans to provide parallel billing information to its customers so they can modify their pattern of energy usage and thus mitigate the impact of potential bill increases.

# 2- Upgrade of the AMI System of Ottawa River Power Corporation

ORPC uses the Elster AMI system to collect the customers' TOU energy usage data and deliver it to the IESO for central processing. Currently ORPC is using version 6.2, but must upgrade to version 7.5 to meet the requirements of Measurement Canada. The upgrade is planned for the summer period (July/August 2011). ORPC is carrying out the IESO implementation with us (Cooperative Hydro Embrun), Renfrew Hydro and Hydro 2000. Therefore, version 7.5 conversion from ORPC has to be coordinated with all the utilities' SIT and QT testing. When we (Renfrew, Cooperative Hydro Embrun and Hydro 2000) have completed testing the conversion of the AMI system can be undertaken and then the system must be extensively tested before full implementation of TOU pricing.

## 3- Upgrade of the IESO System

Cooperative Hydro Embrun will also have to re-complete SIT and QT testing after the IESO completes their system upgrade to version 7.2 that is expected in November 2011.

For these reasons, Cooperative Hydro Embrun respectfully request that the Board grant approval for a revised mandatory TOU implementation end-date of January 2012. This will have no material impact on the costs of Cooperative Hydro Embrun smart meter and TOU implementation plan.

Benoit Lamarche

Manager

Cooperative Hydro Embrun Inc.

Appendix A

Ontario Energy Board Commission de l'énergie de l'Ontario



EB-2010-0372

**IN THE MATTER OF** the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B;

**AND IN THE MATTER OF** an application pursuant to section 74 of the *Ontario Energy Board Act, 1998* by Cooperative Hydro Embrun Inc. seeking an exemption from their Mandated Time-of-Use Pricing Date.

By delegation, before: Jennifer Lea

## **DECISION AND ORDER**

Cooperative Hydro Embrun Inc. ("Cooperative Embrun") filed an application with the Ontario Energy Board on December 6, 2010, under section 74 of the *Ontario Energy Board Act, 1998*, seeking an exemption from their mandated time-of-use ("TOU") pricing date for Regulated Price Plan ("RPP") customers. The Board assigned file number EB-2010-0372 to the application.

### **BACKGROUND**

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. The Board's determination was made pursuant to sections 3.4 and 3.5 of the Standard Supply Service Code for Electricity Distributors, which requires TOU pricing for RPP consumers with eligible TOU meters, as of the mandatory date. Compliance with this Code is a condition of licence for nearly all licensed electricity distributors in Ontario.

## THE APPLICATION

Cooperative Embrun applied for an exemption from its mandated TOU date of June 2011 and requested a new date of October 2011. Cooperative Embrun shares billing resources with Ottawa River Power Corporation ("Ottawa River"). In accordance with the recommendation of Smart Metering Entity ("SME") personnel, Cooperative Embrun is requesting an extension to its mandated TOU pricing date to align with Ottawa River's TOU schedule.

Cooperative Embrun states in its application that it has completed smart meter installation for all customers. Cooperative Embrun indicates that it will be using Ottawa River's Advanced Metering Infrastructure for obtaining meter readings and Ottawa River's customer information system for TOU pricing. Following discussions with the SME, Cooperative Embrun decided it would be best to coordinate its SME enrollment with Ottawa River's enrollment schedule. Ottawa River has a mandated TOU pricing date of October 2011. For reasons of economy, organization and training, Cooperative Embrun requested the same mandatory TOU pricing date.

In response to interrogatories Cooperative Embrun states there are no cost consequences to this delay in TOU implementation.

The Notice of Application and Written Hearing for Cooperative Embrun's application was issued on January 10, 2011, and interrogatories and submissions on the application were invited. The applicant responded to interrogatories filed by Board staff, providing more information about the delays and progress to date in implementing TOU pricing. Board staff filed a submission on the application stating it had no issues with the request for exemption. The applicant did not respond to the submission.

#### **BOARD FINDINGS**

I find the application should be granted. Cooperative Embrun will be exempted from the requirement to apply TOU pricing under the Standard Supply Service Code until October 31, 2011.

Cooperative Embrun has taken the responsible step of seeking an exemption from the Board well in advance of its mandated TOU date. The reasons given in the application

for missing the original date are credible and supported by the evidence filed with the application. The applicant is coordinating the SME enrollment and sharing efficiencies for TOU billing with Ottawa River, and therefore will complete the process on the same mandatory TOU pricing date as Ottawa River. The applicant has provided assurance that there are no other factors that would cause further delay in its implementation of TOU pricing. Cooperative Embrun has made a considerable effort towards completing TOU pricing implementation, and has completed 100% of its smart meter deployment to its customers. I find that the efforts made by Cooperative Embrun to date, and the efficiencies to be achieved by its co-ordination with Ottawa River are sufficient to justify an extension of Cooperative Embrun's mandatory TOU pricing date.

### IT IS THEREFORE ORDERED THAT:

 Cooperative Hydro Embrun Inc.'s distribution licence ED-2002-0493, specifically Schedule 3 List of Code Exemptions, is amended to include an exemption from the requirement to apply time-of-use pricing by a mandatory date under the Standard Supply Service Code for Electricity Distributors. This exemption will expire on October 31, 2011.

DATED at Toronto, March 28, 2011

### **ONTARIO ENERGY BOARD**

Original signed by

Jennifer Lea Counsel, Special Projects 11 Appendix B"

ummary	martine and the second						
Distributor Name							
Cooperative Hydro Embrun Inc.							
For the Period From	For the Period To		First Submitted On				
June 1, 2011	June 30, 2011						
Submitter Name	Status		Due Date				
Benoit Lamarche	Work-in-Progress		July 11, 2011				
RRR Filing No	Report Version		Edit Date	Edit Date			
16	0		July 6, 2011 12:21 PM				
Expiry Date			,				
July 12, 2011							
PP Eligible Consumers:							
Description		Residential Class	General Service Less Than 50kW Class	Total			
Total Number of RPP-eligible const	umers	1,599	161	1,760			
Number of smart meters installed in	n the period	0	0	0			
Number of smart meters registered period	with the MDM/R in the	0	0	0			
Number of RPP consumers being of added in the period	charged TOU prices	0	0	0			
Total cumulative number of smart r service area at the end of the period		1,599	183	1,782			
Total cumulative number of smart r the MDM/R at the end of the period		0	0	0			
Total cumulative number of consur TOU prices at the end of the period		0	0	C			
Percentages (Calculated on Save)			The latest terms of the la	HHHH			
Percentage of RPP-eligible con	sumers with smart me	ters installed at	the end of the period				
Residential Class	General Service 50kW Class	e Less Than	Total				
100.00	113.70		101.30				
Percentage of total smart meter	rs installed that are rec	nistered with the	MDM/R at the end of the pe	riod			
Residential Class	General Service 50kW Class		•				
0.00	0.00		0.00				
Percentage of total RPP-eligible	e consumers being cha	arged TOU price	es at the end of the period				
G	General Service 50kW Class	-	Total				
Residential Class	OURVV Olass						

rogress Re <sub>l</sub>	port on SME	E Milestones				TO THE OWNER OF THE OWNER							
Activity		Original Scheduled Completion Date			Stat		Expected Completion Date			Actual Completion Date			1
1. AMCC Int Testing	ernal Janu	January 20, 2010			Cor	omp January 20, 2010		J	January 20, 2010				
Activity		Original Scheduled Completion Date			Stat		Expected Completion Date			Actual Completion Date			1
2. CIS Interr Testing	CIS Internal December 24, 2010				Comp		January 12, 2011			January 12, 2011		ry 12, 2011	<b> </b>
		en en samme de la companya de la co	etinenesso entoquies			turittikas esittemas arandas periodesia		***************************************		MANUFACTURE STATE			MILOSER MARKET
				and the same of th		Expected Compl		nple	etion Act		ctual Completion		
3. MDM/R Registration Application submitted			Ye	Yes .		July 23,	July 23, 2010		- Approximately -		23, 2	23, 2010	
					20.401259300100								
			·····	Yes	\P (	Status, i	f Evne	acte	d Complet	ion	Λcti	ıal Completi	on.
A ctivity						Yes		Date		1011	on Actual Completion Date		
(Note: the S	ME will eithe	ested and confi er confirm the		Yes		On Sch	Octo	ber	15, 2011		Octo	ober 15, 2011	
AND WARD LINE	tart date of s	suggest an alter	nate)			dan samuan and an							
						lev		Cal	mulation			LCompletion	
Activity		suggest an altern		etion	Statı	ıs Ex		Co	mpletion		ctua ate	I Completion	
Activity 5. Unit Testing	Original	Scheduled Co		etion	Statu	Da Da				D	ate	I Completion	1
5. Unit	Original Date	Scheduled Co		Technologia		Da Da	te			D	ate		1
5. Unit Testing	Original Date	Scheduled Co	omple		Comp	Da Ju	te	011	Expected Completion	D J	ate	Actual Completion	1
5. Unit Testing  Activity  6. Submitte Certification SME_FORM submitted a	Original Date  March 8,  d a complete for Enrolmed M_0007 (Noint least one v	Scheduled Co	omple O C	rigina	Comp	Da Dau Date	ne 17, 2	011 s	Expected	D J	ate	10, 2011 Actual	
5. Unit Testing  Activity  6. Submitte Certification SME_FORM submitted a	Original Date  March 8,  d a complete for Enrolmed M_0007 (Noint least one v	Scheduled Co 2011  ed Self ent Testing te: This must be veek prior to the	omple O C	rigina	Comp	Da Dau Date	status	011 s	Expected Completion Date	D J	ate une 1	Actual Completion Date	
5. Unit Testing  Activity  6. Submitte Certification SME_FORM submitted a	Original Date  March 8,  d a complete for Enrolmed M_0007 (Noint least one v	Scheduled Co 2011  ed Self ent Testing te: This must be veek prior to the	omple O C	origina omple	Comp	Da Dau Date	Status Comp	o111	Expected Completion Date	J J D D D D D D D D D D D D D D D D D D	ate une 1	Actual Completion Date  June 6, 2011	
5. Unit Testing  Activity  6. Submitte Certification SME_FORM submitted a confirmed e  Activity  7. System	Original Date  March 8,  d a complete for Enrolmed M_0007 (Noint least one v	Scheduled Co 2011  ed Self ent Testing te: This must be veek prior to the ave start date)  Original Scl Completion	omple O C	origina omple	Comp	Da Juneduled Date	Status Comp	ooto	Expected Completion Date	J J D D D D D D D D D D D D D D D D D D	Act Dat	Actual Completion Date  June 6, 2011	ion
5. Unit Testing  Activity  6. Submittee Certification SME_FORM submitted a confirmed e  Activity  7. System	Original Date  March 8,  d a complete for Enrolmed M_0007 (Not tleast one venrolment was	Scheduled Co 2011  ed Self ent Testing te: This must be veek prior to the ave start date)  Original Scl Completion	omple O C	origina omple	I Schetion	Da Juneduled Date	Status Comp	ooto	Expected Completion Date  June 17, 20	D J J J J J J J J J J J J J J J J J J J	Act Dat	Actual Completion Date  June 6, 2011	

	Completion Date		Date	Date	
. Qualification esting (QT) May 15, 2011					
Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date	
9. Self Certification - Cutover		Behin	July 29, 2011	<b>#</b>	
Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date	
10. Transition to Production Operation	May 31, 2011	Behin	August 12, 2011		
dditional Comments	s and Information				
Additional Comme	ents				
				0	
	INC. IS AN AREA THE REAL TOTAL OF THE PROPERTY.				
Declaration: I confi	irm that the information containe	ed in this re	port is true, accurate, and	complete.	
	oose Yes to submit this filing. Oth				
* Submit Form					