

August 19, 2011

**VIA RESS and Courier**

Ontario Energy Board  
P.O. Box 2319  
27th Floor  
2300 Yonge Street  
Toronto ON M4P 1E4

Attention: Ms. Kirsten Walli, Board Secretary

**Re: Application for an Extension to Mandated Time-of-Use (TOU) Pricing Date for  
416 General Service < 50 kW RPP Customers and 40 Residential Customers**

Dear Ms. Walli:

In its letter dated August 4, 2010 the Ontario Energy Board "... *set out the mandatory TOU date ...*" of September 2011 for Haldimand County Hydro Inc. (HCHI) as stated in Appendix E of the letter. This application requests an extension to the mandated TOU pricing date for HCHI's three phase General Service < 50 kW RPP customers and its three phase Residential customers to January 31, 2012.

An issue that HCHI understood would have been resolved much earlier is still not resolved and no firm date for complete resolution has been provided by its Advanced Metering Infrastructure (AMI) supplier. The issue prevents HCHI from TOU billing its affected three phase customers until a remedy by the AMI supplier can be put in place. The identical problem has been described in significant detail by other LDC's in their applications for delay, specifically Kitchener-Wilmot Hydro (EB-2011-0239), and Waterloo North Hydro (EB-2011-0240).

Sensus Metering Systems Inc. ("Sensus") was selected as the supplier of AMI technology and Smart Meters for HCHI. On June 2, 2011, HCHI was notified by Sensus that it had investigated and confirmed that interval data delivered from certain three phase meters is suspect due to improper time alignment of the consumption intervals. Sensus recommended that the meters should not be relied on for time aligned Time-Of-Use interval billing of customers. A copy of the Sensus Product Information Notice (PIN: EM-25-May-2011-1) is attached for your reference. This Product Information Notice applies to approximately 416 of 2,357 meters in the General Service < 50 kW RPP Customer class and 40 of 18,485 meters in the Residential Customer class.

Sensus has advised that an upgrade of its radio firmware is required and that this version of the radio firmware would be submitted to Measurement Canada for approval. After Measurement Canada approval is received Sensus will distribute the approved firmware to distributors. Distributors would then be required to install and test the upgraded firmware extensively prior to any commencement of use of these three phase meters for TOU billing purposes. In emails dated August 8, 2011 Sensus states it "... will proceed with the NEPA RNI upgrade on Thursday, September 15th. The original plan was to do the update in evening/on a weekend; however, due to lack of development support we are unable to upgrade outside of business hours -- it introduces too much risk. The upgrade will commence at 10 AM and take approximately 7 hours to complete; thereafter, we will proceed with system tests."

and

"We have not received the MAL from MC as of yet; however, we expect to hear back from them shortly". (Note: MAL means Modification Acceptance Letter and MC is Measurement Canada)

Based on the information from Sensus and the lack of specific time frames provided, other than the September 15<sup>th</sup> RNI update, HCHI cannot be definitive at this time as to the TOU pricing commencement date for these three phase customers. According to the submissions of Kitchener-Wilmot Hydro "Sensus has stated that it believes that all necessary steps can be completed to have the meters fully compliant by Jan 31, 2012. Unfortunately, remedies for the situation that KWH finds itself in are not in the hands of KWH, but in the hands of Sensus and Measurement Canada."

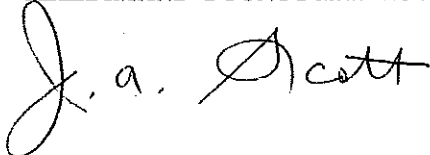
The attached Sensus Notice includes the statement, "To the extent that these same meters are being used as consumption meters, all reported consumption data is accurate and can be used for (RPP) billing purposes."

Having considered HCHI's supporting information on developments that are outside of its control, we respectfully request that the Ontario Energy Board extend the mandatory TOU pricing date for its approximately 416 three phase General Service <50 kW RPP customers and 40 three phase Residential customers from September 2011 to January 31, 2012.

Haldimand County Hydro requests that this application be disposed of by way of a written hearing.

Yours truly,

**HALDIMAND COUNTY HYDRO INC.**



Jacqueline A. Scott  
Finance Manager



## Product Information Notice



Subject: <u>Suspect Interval Data on Elster ALPHA A3 Meters</u>	PIN: <u>EM-25-May-2011-1</u>		
	Date: <u>May 25, 2011</u>		
Distribution:	Sensus Internal & Sales: <input checked="" type="checkbox"/>	Distributors & Agents: <input checked="" type="checkbox"/>	Customers: <input checked="" type="checkbox"/>

Dear Valued Sensus Customer:

Sensus has investigated and confirmed that interval data delivered in the FlexNet Supervisory Message from Elster ALPHA A3 meters running FlexNet communications firmware version 1.2.B is suspect due to improper time-alignment of the consumption intervals. This is caused by delays of metrology register read requests from the FlexNet communications board or by metrology real-time clock adjustments by the network.

Therefore, Sensus recommends that ALPHA A3 meters (w/512k Flash) with FlexNet board firmware Version 1.2.B should not be relied on for time aligned Time-Of-Use (TOU) interval billing of customers.

Sensus has developed a firmware update for the FlexNet communications (radio) module in the Elster ALPHA A3 meters that addresses these issues. Therefore, any customers intending to use the Elster ALPHA A3 meters for TOU billing purposes are required to execute the following actions before initiating TOU billing. **To be clear, Elster meter metrology firmware will not be updated.**

#### Actions for Resolution:

1. Sensus will release V2.1.3.0 FlexNet radio firmware from System Test week of May 30, 2011
2. Elster FlexNet radio firmware Version 2.1.3.0 will be immediately submitted to Measurement Canada for approval. It is expected that Sensus will receive Measurement Canada approval (via a Modification Acceptance Letter) to load this firmware image within the next 2-3 weeks with work commencing immediately upon receipt of the approval.
3. Sensus will distribute this new firmware to customers for over-the-air update of their Elster meter populations. In the coming days, Sensus' Project Management will be working on a deployment schedule for all Canadian customers and your specific Project Manager will be in contact with you directly to schedule the upgrade.
4. Sensus AEMs and Project Managers will aid customers in over the air updating of all Elster meters in their meter populations. There are no RNI FlexWare version dependencies, however on-air firmware upgrades are most efficient when run using FlexWare version 2.2.x or greater.

**Important: To the extent that these same meters are being used as consumption meters, all reported consumption data is accurate and can be used for billing purposes.**

Sincerely,  
Chuck Armatys