

October 14, 2011

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

Dear Ms. Walli:


Re: Guelph Hydro Electric Systems Inc. (Guelph Hydro) Application for an Exemption from its Mandated Date for 2,482 Small Commercial Customers

In accordance with the OEB's letter dated August 4, 2010, re: Determination under Section 1.2.1 of the Standard Supply Service Code to mandate Time-of-Use Pricing for Regulated Price Plan Customers, please find accompanying this letter Guelph Hydro's Application for an Exemption from its Mandated Date for Time-of-Use Pricing for 2,482 small commercial customers in our billing Cycle 9.

Guelph Hydro is hereby seeking an extension for the implementation of TOU rates for the 2,482 small commercial customers to August 31, 2012. Of the 2,482 small commercial meters, 2,096 meters are required to be removed, reprogrammed, resealed and reinstalled to meet Measurement Canada requirements, due to a meter interval data configuration issue, described in more detail in the accompanying letter. The extension includes the remaining 386 meters within Cycle 9, as the mixed-mode billing with the SunGard billing system is impractical and could compromise the accuracy of customers' bills. We note that currently there is no impact on customer billing, as TOU billing has not been activated for these accounts.

Should there be any questions, please contact me at the number below.

Respectfully Submitted,



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Preamble

On August 4, 2010 the Ontario Energy Board (OEB) issued a determination (The Letter) under Section 1.2.1 of the Standard Supply Service Code to require the implementation of TOU pricing for Regulated Price Plan customers. The determination established mandatory TOU implementation dates for each electricity distributor, with Guelph Hydro's mandatory TOU date of June 2011.

By its Letter, the OEB acknowledged that distributors may encounter extraordinary and unanticipated circumstances during the implementation of TOU pricing. The OEB requested that any distributor encountering such circumstances bring these matters to the OEB's attention in order that the OEB can assess the impact on the distributor's mandatory TOU date and assess whether any adjustments in that date is warranted.

1. Guelph Hydro's circumstances of making the application:

Guelph Hydro services approximately 48,000 eligible RPP customers in the city of Guelph and 1,750 eligible RPP customers in the town of Rockwood.

- Guelph Hydro is on target to meet its mandatory TOU implementation date for all Guelph residential class customers, but in the process of working through the Meter Data Management and Repository (MDMR) account integration for TOU readiness, has encountered an issue with 2,096 installed and MDMR registered small commercial class meters. We note that currently there is no impact on billing for these customers, as TOU billing has not been activated for these accounts.
- These 2,096 small commercial meters are metering energy accurately using the meter's register reads, but we have discovered that for small commercial customers whose load exceeds a 16.384 kW threshold, the meter's load profile information (interval data) does not

accurately register the energy consumption above the 16.384 kW threshold. Initial analysis indicates that this condition may affect 10-15% of this meter population.

- In working with the Silver Spring Networks Inc. (SSN), the networking system provider, and General Electric (GE), the smart meter provider, we have confirmed that the root cause of this condition is a meter load profile programming error, which cannot be field corrected due to Measurement Canada meter sealing and verification requirements. All of these 2,096 meters must be removed from the field, have their meter seal broken, must be factory reprogrammed and resealed, and then reinstalled in the field.
- We have worked with both SSN and GE to develop a realistic project plan and timeline to address this field issue. We will receive of a group of about 400 “seed meters” that will be used to process the meter exchanges in a series of cycles, starting in November 2011, and continuing through to the end of July 2012. The meters removed from the field will be returned to GE for reprogramming and resealing to meet Measurement Canada sealing requirements. After GE has completed the reprogramming and resealing, the meters will be shipped by the Guelph Hydro for installation at other locations with the problematic meters. These meters will be used as replacements, continuing this process in cycles until all 2,096 meters have been repaired and field replaced. We propose to activate TOU billing on all of the 2,482 small commercial customer accounts billed in Cycle 9 after all the problematic meters have been exchanged, starting in August 2012.
- In accommodating the meter’s load profile programming, we note that SSN must also create a new scaling factor algorithm in the head end software to accommodate for the GE meter’s load profile programming. SSN has confirmed that this software enhancement is feasible, and is now working on building this code into their baseline head end software. This development work is expected to be completed and implemented in November 2011.

2. Guelph Hydro's current status of Smart Meter deployment and TOU implementation:

- The current status of Guelph Hydro's smart meter deployment and TOU implementation, including its progress on the ten milestones reported for the month-end of September, 2011 is as follows:

Summary

Distributor Name

For the Period From

For the Period To

First Submitted On

Submitter Name

Status

Due Date

RRR Filing No

Report Version

Edit Date

Expiry Date

RPP Eligible Consumers:

Description	Residential Class	General Service Less Than 50kW Class	Total
Total Number of RPP-eligible consumers			48,044
Number of smart meters installed in the period			95
Number of smart meters registered with the MDM/R in the period			401
Number of RPP consumers being charged TOU prices added in the period			401
Total cumulative number of smart meters installed in the service area at the end of the period			49,583
Total cumulative number of smart meters registered with the MDM/R at the end of the period			47,833
Total cumulative number of consumers being charged TOU prices at the end of the period			45,354

Percentages (Calculated on Save)

Percentage of RPP-eligible consumers with smart meters installed at the end of the period

	General Service Less Than 50kW	
Residential Class	Class	Total




Percentage of total smart meters installed that are registered with the MDM/R at the end of the period




	General Service Less Than 50kW	
Residential Class	Class	Total



Percentage of total RPP-eligible consumers being charged TOU prices at the end of the period



	General Service Less Than 50kW	
Residential Class	Class	Total




Progress Report on SME Milestones




Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
1. AMCC Internal Testing		Completed		




Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
2. CIS Internal Testing		Completed		

Activity	Yes or No?	Expected Completion Date	Actual Completion Date
3. MDM/R Registration Application submitted	Yes		




Activity	Yes or No?	Status, if Yes	Expected Completion Date	Actual Completion Date
4. Enrolment Wave requested and confirmed (Note: the SME will either confirm the requested start date or suggest an alternate)	Yes	On Schedule		




Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
5. Unit Testing		Completed		




Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
6. Submitted a completed Self Certification for Enrolment Testing SME_FORM_0007 (Note: This must be submitted at least one week prior to the confirmed enrolment wave start date)		Completed		

Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
7. System Integration Testing (SIT)		Completed		

Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
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8. Qualification Testing (QT)		Completed		
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Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
9. Self Certification - Cutover		Completed		

Activity	Original Scheduled Completion Date	Status	Expected Completion Date	Actual Completion Date
10. Transition to Production Operations		Completed		

Additional Comments and Information

Additional Comments

Declaration: I confirm that the information contained in this report is true, accurate, and complete.
 IMPORTANT: Choose Yes to submit this filing. Otherwise the form will be saved but not submitted.

* Submit Form

No