

Dear Sirs/Madams,

In preparation for the Ontario Energy Board Staff Information Session taking place on December 8th and 9th of 2011 Just Energy Ontario L.P. ("Just Energy") would respectfully submit the following questions.

1) On page 48 of the Staff Discussion Paper in regard to the Establishment, Implementation and Promotion of a Smart Grid in Ontario Board Staff state that;

"Interval data (i.e. billing quality data) processed by distributors can be provided to retailers by means of the Electronic Business Transactions (EBT) system, however the provision of smart meter data is currently not permitted under the RSC. This prohibition was included in the RSC to allow for the transition to smart meters and the MDM/R."

Board staff later state that, "Any consumer has the right to access the "raw data" produced by the meter attached to their location and to assign this right to third parties..."

Given that smart meter implementation is well underway in Ontario, that through the MDM/R and EBT systems retailers could have access to customer interval data, and that customers currently have the right to assign access to this data to a third party, what steps need to be taken aside from a revision to the Retail Settlement Code to allow electricity retailers access to this data?

2) On page 49 of the Staff Discussion Paper in regard to the Establishment, Implementation and Promotion of a Smart Grid in Ontario Board Staff state that;

"... in Ontario at present it is not possible to reconcile continuous displays of cost with billing data. The main reason for this is that the Global Adjustment (GA) portion of the cost cannot be derived on a real time basis as it is a function of monthly costs. For most residential and low-volume consumers these costs are captured in the Regulated Price Plan (RPP) rates ...For consumers served by retailers or paying the spot price for electricity, the exact value of the GA applicable to "real-time" consumption cannot be known until the end of the billing month."

Just Energy would ask whether Board Staff have considered potential avenues for estimating or pro-rating Global Adjustment charges for the purpose of smart grid integration. Just Energy also makes note that should regulated utilities making use of RPP pricing be allowed to participate in a competitive technology and innovation market beyond-the-meter the nature of the Global Adjustment charge for customers of electricity retailers could severely hinder the competitiveness of retail offerings.

3) On page 48 of the *Staff Discussion Paper in regard to the Establishment, Implementation and Promotion of a Smart Grid in Ontario* Board Staff bring attention to;

“...the importance of clear lines of demarcation between rate supported activities and activities that are beyond the scope of the regulated utility.”

Just Energy would ask what value the Board Staff or participants in the Smart Grid Working Group do or do not see in placing control of beyond-the-meter activities within the purview of regulated utilities.

4) On page 50 of the *Staff Discussion Paper in regard to the Establishment, Implementation and Promotion of a Smart Grid in Ontario* Board Staff state that;

“Currently only licensed retailers may access customers’ billing data with the consent of the customer...”

Just Energy would ask the Board Staff to comment on how the application of a smart grid will alter the reasoning behind restricting this information access to licensed energy suppliers.

Should you have any questions or comments in response to these inquiries please do not hesitate to contact me.

Kind regards,



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