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January 31, 2012

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

**Re: EB-2011-0224 Application for extension to Mandated TOU Date
Information Update**

Bluewater Power Distribution Corporation ("Bluewater Power") sought an extension to its mandated TOU billing date on June 6, 2011. The Ontario Energy Board, through its Counsel, Special Projects issued a decision on October 6, 2011 granting as follows:

"Bluewater will be exempted from the requirement to apply TOU pricing under the Standard Supply Service Code until January 31, 2012"; and

"I expect the applicant to work diligently to implement TOU for its customers and provide the Board with timely information regarding the implementation of TOU pricing."

On December 8, 2011, Bluewater Power provided an update to the OEB advising that delays at the IESO in the implementation of R7.2 put our implementation date in jeopardy. We committed to provide further update as soon as information was available.

In the meantime, we continued to work diligently to implement TOU pricing for our customers, and we are pleased to inform the OEB that all required testing with the IESO has been completed as of December 19, 2011. Bluewater Power has successfully completed all required registration and enrolment activities with the IESO and as of January 16, 2012 has cut over to production MDM/R operations. We are currently waiting for the release of R7.2 into Production from the IESO, so that we can commence billing customers on TOU.

The IESO released an update on January 25, 2012 (attached) which indicates that February and the first two weeks of March 2012 will comprise the full extent of performance testing of R7.2. During the third week of March, the IESO will make a decision to proceed or not with the release of R7.2 at which point LDCs will be able to move to their production environment.

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If the current IESO schedule is met, Bluewater will be in a position to commence billing TOU rates for billing periods that begin on or after March 15, 2012.

This letter is submitted as an update for the Board in compliance with the OEB's decision dated October 6, 2011. It is our understanding that no further application for an extension is required provided that Bluewater Power diligently pursues TOU implementation and we meet our obligation to keep the OEB informed of our progress. This understanding was confirmed by Board Staff by e-mail on December 19, 2011. In the situation at hand, the cause of the further delay is beyond our control, Bluewater Power has taken all necessary steps to move toward implementation of TOU pricing and we have provided updates in a timely manner.

We trust the foregoing is satisfactory.

Sincerely,



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High Level R7.2 Target Deployment Schedule - Revision 7 - January 25, 2012

LINE NUMBER	ACTIVITIES	ENVIRONMENT	2011						2012									
			FEB	MAR	APR	MAY	JUN	DEC	JAN	FEB	MAR	APR	MAY	JUN				
1 - See Note A	R7.2 Base - Availability from eMeter (includes 2011 MC Solution Component #s 1, 2, 4, 5, X, Y)	N/A	▲															
2 - See Note A	Configure and Checkout proper functioning of 2011 MC Solution Component # Z in R7.2	S/B2			■	■												
3 - See Note A	R7.2 Base Service Pack 3 Availability from eMeter (includes 2011 MC Solution Component # SP "3")	N/A		▲	▲													
4 - See Note A	R7.2 2011 MC Solution - Availability from eMeter (includes 2011 MC Solution Component # 3)	N/A				▲												
5 - See Note A	MECA 4 - Availability from eMeter	N/A							▲									
6 - See Note A	CC 10 - Availability from eMeter	N/A							▲									
7 - See Note A	SP 12 - Availability from eMeter	N/A							▲									
8 - See Note A	Hot-fixes on SP12/CC10/MECA4 - Targeted Availability from eMeter	N/A								▲								
9 - See Note A	SP 13 - Availability from eMeter	N/A								▲								
10 - See Note A	CC 11 - Availability from eMeter	N/A								▲								
11 - See Note A	R7.2 2012 MC Solution: Phase 1 - Availability from eMeter (includes 2012 MC Solution Component # 6)	N/A									▲							
12 - See Note A	R7.2 2012 MC Solution: Phase 2 - Availability from eMeter (includes 2012 MC Solution Component # 7)	N/A																▲
13																		
14	R7.2 SP10/CC8/MECA3 with 2011 MC Solution in Sandbox 2	S/B2																
15	IESO overall testing of R7.2 SP10/CC8/MECA3 with MC 2011 Solution in Sandbox 2	S/B2																
16																		
17	Deploy R7.2 SP12/CC10/MECA4 with 2011 MC Solution in Sandbox 2	S/B2																
18	IESO overall testing of R7.2 SP12/CC10/MECA4 with MC 2011 Solution in Sandbox 2	S/B2																
19	Deploy Hot-fixes on R7.2 SP12/CC10/MECA4 with 2011 MC Solution in Sandbox 2	S/B2																
20	IESO overall testing of R7.2 SP12/CC10/MECA4 + Hot-fixes with MC 2011 Solution in Sandbox 2	S/B2																
21																		
22	Deploy R7.2 2012 MC 2012 Solution: Phase 1 with SP13/CC11/MECA4 with 2011 MC Solution in Sandbox 2	S/B2																
23	IESO Overall Testing of R7.2 2012 MC 2012 Solution: Phase 1 with SP13/CC11/MECA4 with 2011 MC Solution in Sandbox 2	S/B2																
24																		
25	R7.2 SP10/CC8/MECA3 with 2011 MC Solution in Sandbox	S/B																
26	IESO Overall Testing of R7.2 SP10/CC8/MECA3 with 2011 MC Solution in Sandbox	S/B																
27	LDC regression and certification testing of R7.2 SP10/CC8/MECA3 with 2011 MC Solution in Sandbox	S/B																
28																		
29	Deploy R7.2 SP13/CC11/MECA4 with Hot-fixes and MC 2011 and Phase 1 of MC 2012 Solutions in Sandbox	S/B																
30	IESO Overall Testing of R7.2 SP13/CC11/MECA4 with Hot-fixes and MC 2011 and Phase 1 of MC 2012 Solutions in Sandbox	S/B																
31	LDC regression and certification testing of R7.2 SP13/CC11/MECA4 with Hot-fixes and MC 2011 and Phase 1 of MC 2012 Solutions in San	S/B																
32																		
33	R7.2 SP10/CC8/MECA3 with 2011 MC Solution in Prod Support	Prod Support																
34	Conduct Performance Testing of R7.2 SP10/CC8/MECA3 with MC 2011 Solution in Prod Support	Prod Support																
35																		
36	Deploy R7.2 SP13/CC11/MECA4 with Hot-fixes and MC 2011 and Phase 1 of MC 2012 Solutions in Prod Support	Prod Support																
37	Conduct Performance Testing of R7.2 SP13/CC11/MECA4 with Hot-fixes and MC 2011 and Phase 1 of MC 2012 Solutions in Prod Support	Prod Support																
38																		
39	YEAR END PRODUCTION CODE FREEZE	Production																
40	Go/No-Go Decision on whether to promote R7.2 SP13/CC11/MECA4 with Hot-fixes and MC 2011 and Phase 1 of MC 2012 Solutions to Production	N/A																
41	Promote R7.2 SP13/CC11/MECA4 with Hot-fixes and MC 2011 and Phase 1 of MC 2012 Solutions to Production	Production																
42	Promote R7.2 SP13/CC11/MECA4 with Hot-fixes and MC 2011 and Phase 1 of MC 2012 Solutions to QA and DR	QA/DR																
43																		

NOTES: (A) Refer to the "Table of 2011 & 2012 Measurement Canada Solutions Components" for the identification of the specific elements of the 2011 & 2012 Measurement Canada Solutions being delivered or checked out in Line Numbers 1 thru 12 of the schedule.

(B) Because R7.2 SP13/CC11/MECA4 and Phase 1 of the Measurement Canada 2012 Solution are being delivered at the same time, we will conduct testing on the entire package with the idea that if everything tests successfully we will promote the entire package to production at the end of March. Should it become apparent that Phase 1 of the MC 2012 Solution needs additional test/correction cycles before it is production ready, we will decouple it from the R7.2 promotion to production.

Table of 2011 & 2012 Measurement Canada Solutions Components

Component #	Component Function	Component Element(s)
1	Register Reads on Billing Invoice	A. Billing Service Standard XML Interface B. Measurement Profile Extensions for Register Reads and Decimal Place Precision (to 6 decimal places) C. Delivery of Service Pack "X" for Incorporating Universal SDP ID into Billing Quantity Response
2	Midnight-to-Midnight Billing Period	A. Core Billing Process (remains as is in current EnergyIP product) B. Register Read Billing Window and Execution Window (provides different configuration for On Cycle and Off Cycle requests) C. Data Delivery Service (configuration will provide for ODEST and Manual Read or Manual Read only exception handling)
3	Register Read Calculator	A. Register Read Calculator B. Calculated Register Read Change Monitor
4	Partial Day Framing	A. Billing Service Standard XML Interface (provides partial day framing as part of core functionality)
5	RR to Interval Data and TOU Usage Check Tolerance	A. Message Sum Check (existing functionality with validation set to "Estimate") B. VEE Post Processor (check of estimated interval data to assure register read scaling) - Real-time and Billing Estimation C. Billing Validation Sum Check (reconfigured to a "Value" based check with max threshold setting based on AMI technologies)
SP "3"	Billing Service Standard XML Interface enhancements	A. Validation of the SDP to Billing Agent Relationship for the Standard Billing XML Interface request B. Standard Billing XML Interface reply to return the "SDP_X_UNIVERSAL_ID" in the ServicePoint/idType C. Standard Billing XML Interface reply to return external request file identifier using the 'billing_request' table "EXTNL_BATCH_ID" in the Reply/correlationid D. Track External Batch ID
SP 10	Defect fixes (Previously Delivered)	
CC 8	Defect fixes (Previously Delivered)	
MECA3	Defect fixes (Previously Delivered)	
SP12	Defect fixes (Delivered December 30, 2011)	NOTE: SP11 was not installed because it didn't contain any corrections for problems being experienced in the MDM/R
CC10	Defect fixes (Delivered December 28, 2011)	
MECA4	Defect fixes (Delivered December 14, 2011)	
Hot-fixes	Defect fixes (Delivered January 18, 2012)	
SP13	Defect fixes targeted for January 26, 2012 Delivery	
CC11	Defect fixes targeted for January 27, 2012 Delivery	NOTE: CC11 will also include Phase 1 of the Measurement Canada 2012 Solution (Component #6 in this table)
6	Measurement Canada 2012 Solution - Phase 1	A. Calculative Reads Equality Adjustment (TOU) and Related Demand Measurement Profiles - targeted for delivery January 27, 2012
7	Measurement Canada 2012 Solution - Phase 2	A. Calculative Reads Equality Adjustment (Periodic and Hourly) and Related Demand Measurement Profiles - targeted for delivery June 14, 2012 B. Quality Indicators for Estimated and Calculated Register Reads - targeted for delivery June 14, 2012 C. Meter Reading Interface for Estimated Meter Reads - targeted for delivery June 14, 2012
X	Increased Meter Read Data Precision	A. Available with R7.2 base system delivered January 31, 2011 - Register Reads and Interval Data to (6) Decimal Places
Y	Dial Rollover Tolerance Check	A. Available with R7.2 base system delivered January 31, 2011 - False Dial Rollover Fix
Z	Web Services Register Readings	A. Web Services (provision of Register Readings by Web Services is a current configurable functionality available in R7.0, that will continue to be tested under R7.2)

Legend:	NOTE: Color coding of the 2011 & 2012 Measurement Canada Solutions Components aligns with the color coding of the related activities on the accompanying schedule.
	= Already delivered as part of R7.2 and/or MC 2011 Solution
	= RESERVED FOR FUTURE USE
	= Combined testing of R7.2 SP13/CC11/MECA4 and Phase 1 of the Measurement Canada 2012 Solution
	= To be delivered as part of the Measurement Canada 2012 Solution on January 27, 2012 and June 14, 2012
	= Various Service Pack and Custom Code deliveries to fix identified defects in the combined R7.2 Base and MC 2011 Solution code
	= The previously scheduled delivery date for a component of the 2011 Measurement Canada Solution that had to be rescheduled