



PUBLIC INTEREST ADVOCACY CENTRE
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February 21, 2012

VIA MAIL and E-MAIL

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

Dear Ms. Walli:

Re: Vulnerable Energy Consumers Coalition (VECC)
Submission of VECC Interrogatories EB-2011-0415
Welland Hydro-Electric System Corp.

Please find enclosed the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Thank you.

Yours truly,

Michael Buonaguro
Counsel for VECC
Encl.

cc: Welland Hydro-Electric System Corp.
Mr. Wayne Armstrong

ONTARIO ENERGY BOARD

IN THE MATTER OF

the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15 (Schedule B), as amended;

AND IN THE MATTER OF an Application by
Welland Hydro-Electric System Corp. for an order or orders
approving or fixing just and reasonable
distribution rates to be effective May 1, 2012 to reflect the
recovery of costs for deployed smart meters.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

VECC Question # 1

Reference: Smart Meter Model

Preamble: Welland Hydro completed the Smart Meter Model (Appendix C) provided by the OEB to arrive at the proposed Smart Meter Incremental Rate Rider and the proposed Smart Meter Disposition Rate Rider. Both rate riders are per metered customer per month.

- a) Please provide a copy of the Smart Meter Model by customer class.
- b) Please recast Tables 3, 5 and 7 by customer class based on the revised models. Reconcile to Tables 3, 5 and 7.
- c) Please provide a table that summarizes the total Smart Meter Rate Adder Revenue collected by customer class.
- d) Please provide a new Part C to Appendix F, Welland Hydro Smart Meter – Revenue Requirement Rate Rider, to provide the details of the Revenue Requirement Rate Rider based on Smart Meter Costs by customer class.
- e) Please provide a new Appendix J, Welland Hydro Smart Meter – Disposition Rate Rider, to compare to Appendix H and Appendix I, to provide the details on the Disposition Rate Rider based on Smart Meter Costs by customer class.

VECC Question # 2

Reference: Introduction: Table 3, Page 8 & Table 5, Page 11

Preamble: Welland Hydro proposes uniform smart meter rate riders based on the number of metered customers (21,520).

- a) Please provide the rationale for this approach.

VECC Question # 3

Reference: Introduction, Page 6

Preamble: Welland Hydro provides a comparison of smart meter capital costs in the previous applications to the current application.

- a) Please explain further the changes in workforce automation that reflect additions to systems including meter changes live in the field, operational data storage (ODS) and web presentment that result in an increase in the 2012 forecast.
- b) Please explain the reason for the reduced three phase meter costs and collector costs.

VECC Question # 4

Reference: Introduction, Page 6

Preamble: Welland Hydro indicates the current vendor provided an initial estimate of \$170,000 for modifications to connect the MDM/R and implement time of use billing.

- a) Please confirm the current vendor.

VECC Question # 5

Reference: Board Guideline G-2011-0001, Smart Meter Funding and Cost Recovery – Final Disposition, dated December 15, 2011, Page 19

Preamble: The Guidelines state, “The Board also expects that a distributor will provide evidence on any operational efficiencies and cost savings that result from smart meter implementation.”

- a) Please comment.