



***PUBLIC INTEREST ADVOCACY CENTRE
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March 15, 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-2012-0017
COLLUS Power Corporation**

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: COLLUS Power Corporation
Mr. Tim Fryer

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
COLLUS Power Corporation (COLLUS) 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: Manager's Summary, 1. Introduction, Page 3

Preamble: COLLUS indicates it is requesting the difference between the Deferred Incremental Revenue Requirement from 2007 to December 31, 2011 and the Smart Meter Funding Adder (SMFA) Revenues collected from 2006 to April of 2012. The Board indicated the SMFA would cease by April 30, 2012. VECC notes on Sheet 8 of the Smart Meter Model, the interest on the SMFA revenues is calculated to December 2012.

a) Please explain the interest calculation beyond April 2012.

VECC Question # 2

Reference: Manager's Summary, 2. Status of Implementation of Smart Meters, Page 7

Preamble: COLLUS has installed a total of 15,619 smart meters as of October 31, 2011, which represents 100% of the total meters at that point in time.

a) Please provide the average cost per meter by year and by rate class on a total cost basis (capex + opex) and capex only.

b) Please indicate if COLLUS has provided the Board with estimated smart meter costs in prior rate applications. If yes, please provide a schedule that compares the smart meter forecasts in the previous applications to the current application.

VECC Question # 3

Reference: Manager's Summary, 8. System Changes, Page 10

Preamble: The evidence indicates that it was determined that the system manufacturer Harris Computer Systems (HCS) would not be able to cost effectively make the required modifications. Therefore, the decision was made to and the required changes were also made to implement the Northstar CIS system of HCS so that the TOU functionality was in place when required for TOU billing.

- a) Please explain why HCS would not be able to cost effectively make the required modifications.
- b) Please discuss how these circumstances impacted meter deployment.

VECC Question # 4

Reference: Manager's Summary, 9. Integration with MDM/R, Page 11

Preamble: COLLUS indicates the project plan called for Unit Testing to be executed in November 2010 but due to some delays, was completed in February 2011.

- a) Please explain the nature of these delays.

VECC Question # 5

Reference: Manager's Summary, 10. Transition to Time of Use Pricing, Page 11

Preamble: The application indicates the plans are in the final stages to ensure that as of January 2012 all COLLUS customers, that TOU is applicable to, will be charged for their electricity based on TOU rates on a go forward basis. This schedule was set primarily on the premise of coming into production shortly after the latest MDM/R upgrade was completed to implement the new Version 7.2 software. Unfortunately this upgrade has been delayed but COLLUS continues along with the current plan.

- a) Please provide an update on TOU billing.
- b) Please explain the upgrade delays.
- c) Please confirm the current plan.

VECC Question # 6

Reference: Manager's Summary, Meter Deployment, Page 9

- a) Please summarize the types of meters installed for each rate class.
- b) Please complete the following table to show the average installed cost based on meter type.

Class	Type of Meter	Quantity	Installed Cost	Average Cost
Residential				
GS<50 kW				

VECC Question # 7

Reference: Manager's Summary, 13. Annual Security Audit, Page 13

Preamble: COLLUS indicates with the mass deployment of AMI systems, security of the AMI network is critical.

- a) Please provide the status of the selection of the audit partner and the in-depth security review at one participating utility that has the Sensus solution, the commencement date of the annual security audit for COLLUS and the annual budget for the audit.

VECC Question # 8

Reference: Manager's Summary, Meter Deployment, Page 5

- a) Please discuss the incremental internal labour costs incurred by COLLUS to deploy smart meters.
- b) Please discuss if the automated meter reading process has resulted in reduced meter reading costs and how that this is reflected in the proposed rate adders.

VECC Question # 9

Reference: Manager's Summary, 16. Smart Meter Rate Rider, Page 15

Preamble: COLLUS indicates that allocation of the total revenue requirement is based on allocation of the return and amortization based on the allocation of Account 1860 in the cost allocation model.

- a) Please confirm the date of the cost allocation model used.

VECC Question # 10

Reference 1: Smart Meter Model (V2_17)

Preamble: COLLUS completed the Smart Meter Model provided by the OEB and used the data to arrive at the proposed Smart Meter Incremental Rate Rider and the proposed Smart Meter Disposition Rate Rider.

Reference 2: Board Guideline G-2011-0001, Smart Meter Funding and Cost Recovery – Final Disposition, dated December 15, 2011, Page 19

Preamble: The Guideline states, “The Board views that, where practical and where data is available, class specific SMDRs should be calculated on full cost causality.”

- a) Please complete a separate smart meter revenue requirement model by rate class.
- b) Please recast Tables 3 and 4 by customer class based on customer class cost causality as per part (a). Re-calculate the SMDR & SMIRR rate riders based on cost causality by rate class.
- c) Please provide a table that summarizes the total Smart Meter Rate Adder Revenue collected by customer class.

VECC Question # 11

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 summarize COLLUS’s operational efficiencies and cost savings.