



PUBLIC INTEREST ADVOCACY CENTRE
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ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: piac@piac.ca. <http://www.piac.ca>

Michael Buonaguro
Counsel for VECC
(416) 767-1666

March 26, 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-2012-0008
Peterborough Distribution Inc.

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: Peterborough Distribution Inc.
Mr. John Stephenson

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
Peterborough Distribution Inc. (Peterborough) 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: Application, 2. Status of Implementation of Smart Meters, Page 4

Preamble: The evidence indicates Peterborough has installed a total of 34,924 smart meters as of December 31, 2011, which represents 99.8% of total meters.

- a) Please confirm the total number of meter installations included in this total by customer class and reconcile to Sheet 2 of the Smart Meter Model.
- b) Please confirm the remaining meters to be installed by customer class to reach 100% completion.
- c) Please provide the average cost per meter by year and customer class on a total cost basis (capex + opex) and capex only.
- d) Please discuss any variances (>10%) in average costs per year.

VECC Question # 2

Reference: Application, 2. Status of Implementation of Smart Meters, Page 4

- a) Please summarize the types of meters installed for each rate class.
- b) Please complete the following table to show the average installed cost per meter type based on 1.1.1 and 1.1.2 capital costs from the model.

Class	Type of Meter	Quantity	Meter Cost	Installation	Installed Cost	Average Cost
Residential						

GS<50 kW						
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c) Please complete the Table in Part (b) above based on total capital costs.

VECC Question # 3

Reference: Application, 5. Project Specifics, Meter Deployment, Page 6

- a) Please confirm the number of meters installed for each customer class by Peterborough staff by year.
- b) Please discuss the incremental internal labour costs incurred by Peterborough to deploy smart meters that are included in this application. Include the cost, number of positions (permanent vs. contract, full-time vs. part-time), position type and work activities.

VECC Question # 4

Reference: Application, 8. Integration with MDM/R, Page 8

Preamble: The project plan called for unit testing to begin June 2011, this is now scheduled to be completed on February 7, 2012 and System Integration (SIT) and Qualification Testing (QT) on May 2, 2011, in preparation for cutover to live data transfer with the MDMR on February 27, 2012. The ability to meet these targeted timelines was to a large extent contingent upon clear and complete requirements, software systems delivering the functionality and suppliers meeting their contractual obligations and deadlines.

- a) Please provide specific details related to the inability to meet targeted deadlines and discuss how Peterborough's smart meter implementation has been impacted.
- b) Please provide a status update on the timelines.

VECC Question # 5

Reference: Application, 9. Transition to Time of Use (TOU) Pricing, Page 9

Preamble: Peterborough's mandated date for TOU billing was January 1, 2012. Peterborough is not able to meet the January 1, 2012 deadline and has targeted July 12, 2012. Peterborough was advised by the Board that an extension request was not necessary as the delay was caused by the IESO.

- a) Please explain how the IESO impacted Peterborough's timelines.

VECC Question # 6

Reference: Application, 16. Smart Meter Rate Rider, Page 16

Preamble: Peterborough indicates the average cost of installing smart meters for the residential and GS<50 kW customer classes are \$86.00 and \$303.80, respectively.

- a) Please provide the detailed calculations for these amounts.

VECC Question # 7

Reference: Smart Meter Model (V2_17)

Preamble: Sheet 2 indicates 9 residential; 58 GS<50 kW; and 243 GS>50 kW meter installations are forecast to be installed in 2012 and beyond.

- a) Please confirm Peterborough's meter deployment plans moving forward by year and by rate class. Reconcile to Sheet 2.
- b) Please confirm Peterborough's proposed treatment of the above meter installations.
- c) Please confirm Peterborough's forecasted customer growth for 2011 and 2012.

VECC Question # 8

Reference 1: Smart Meter Model (V2_17)

Preamble: Peterborough 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 5 and 6 by customer class based on customer class cost information calculated in part (a).
- c) Please provide a table that summarizes the total Smart Meter Rate Adder Revenue collected by customer class.

VECC Question # 9

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 Peterborough’s operational efficiencies and cost savings.

VECC Question # 10

Reference: General

- a) Please confirm the timing of Peterborough’s next Cost of Service application.