PUBLIC INTEREST ADVOCACY CENTRE
LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC

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

April 18, 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-2012-0081
Burlington Hydro 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: Burlington Hydro Inc.
Mr. Michael J. Kysley

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
Burlington Hydro Inc. (Burlington) 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 Smart Meter and Time of Use Implementation, Page 10

Preamble: Burlington installed a total of 63,640 smart meters as of year-end 2011.

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

b) Please discuss any variances (>10%) in average costs per year.

VECC Question # 2

Reference: Application 2) Status of Smart Meter and Time of Use Implementation, Page 10

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 and total costs for each meter type.

Class	Type of Meter	Quantity	Average Cost	Total Meter Cost per Meter Type
Residential				
GS<50 kW				
GS>50 kW				

c) Please explain the difference between Elster Rex 1 Smart Meters and Rex 2 Smart Meters.

VECC Question # 3

Reference: Application, 2) Status of Smart Meter and Time of Use Implementation, Page 10

Preamble: The application indicates by the end of December 2011, Burlington decided on the purchasing option to own its AMI system but to have it operated by the AMI vendor.

a) Please discuss the rationale for this decision.

VECC Question # 4

Reference: Smart Meter Recovery Model, Sheet 2

Preamble: On Sheet 2 under 2.5 Other AMI OM&A Costs Related to Minimum Functionality, amounts are shown for the years 2007 to 2012.

a) Please specify the nature of these costs for each year.

VECC Question # 5

Reference: Smart Meter Recovery Model

Preamble: Sheet 2 provides Total Smart Meter OM&A Costs.

a) Please provide a breakdown of the total number and cost of additional incremental permanent and contract staff hired by year for the deployment of smart meters and include the work functions for each position. Please provide all assumptions.

b) Please advise if Burlington used internal staffing resources to install meters. If yes, please provide details of the type, quantity and average installed meter costs.

VECC Question # 6

Reference 1: 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."

Reference 2: Application, Cost Allocation, Page 21

Preamble: Burlington indicates that while detailed records exist for the smart meters acquired for each of the three metered classes, an accurate allocation of the balance of the capital costs together with the operating expenses was not possible with any degree of accuracy.

a) Please discuss the detailed records that exist and the challenges in determining an allocation of costs by rate class.

b) In its 2011 Smart Meter Disposition application (EB-2011-0128), PowerStream proposed a cost allocation methodology using capital costs as the allocation driver as follows:

- Allocation of the return (deemed interest plus return on equity) and amortization between the customer classes based on the capital costs of the meters installed for each class;
- Allocation of OM&A based on number of meters installed for each class;
- Allocation of PILs based on the revenue requirement derived for each class before PILs

Please provide a calculation of class-specific SMDR and SMIRR rate riders based on PowerStream's cost allocation methodology.