



**PUBLIC INTEREST ADVOCACY CENTRE
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May 16, 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-2011-0187
London 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: London Hydro Inc.
Mr. Mike Chase

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
London Hydro Inc. ("London Hydro") 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, Status of Smart Meter Program

Preamble: London Hydro indicates that of the remaining 285 GS<50 kW customers, there is an expectation to install 202 meters in 2012.

- a) Please discuss when the balance of the GS<50 kW meters are forecast to be installed and why the installations are not forecast for 2012.

VECC Question # 2

Reference: Introduction, 1.1.3 The Benefits of Smart Meters, Page 3

Preamble: On Page 3, London Hydro provides a list of some of the specific benefits it expects to obtain. On Page 72 of the application, London Hydro indicates that due to manual meter reading savings, approximately \$330,000 per annum was achieved in 2011 and 2012.

- a) Please quantify any other savings from the benefits listed on Page 3 and indicate how London Hydro has taken these savings into account in this application.

VECC Question # 3

Reference: 4.2.1 Assessment of the Backhaul Options, Page 22

Preamble: London Hydro states on Page 22 that it didn't have existing communications systems with additional capacity available so it carried out a study comparing various public and private options. The recommended option (primarily based on anticipated cost savings) was procurement and installation of a private wireless broadband

communications system.

- a) Please discuss the anticipated cost savings related to the recommended option.
- b) Please advise if the evaluation of the options considered the need for a wireless communications subject matter expert.

VECC Question # 4

Reference: 4.3.1 Smart Meter Installation Strategy, Page 26

Preamble: London Hydro indicates its staff assumed responsibility for smart meter installations on polyphase and transformer related services, both of which require a greater skill level.

- a) Please discuss how these staff costs are accounted for in this application.

VECC Question # 5

Reference: 6.3 Project Management, Page 45

Preamble: London Hydro states it established a Project Management Office to provide oversight and coordination of all IT projects. A dedicated testing team was established for end-to-end regression testing for “meter to cash” processes including all the interfaces to Sensus RNI and MDMR.

- a) Please discuss how the cost of these activities is reflected in this application.

VECC Question # 6

Reference: 9.3.1 Smart Meter Costs, Page 63

Preamble: Associated with 2012 costs, is the hiring by London Hydro of five temporary contract staff in its CIS Department to handle significant customer call volume increases in its call centre pertaining to TOU rollout.

- a) Please discuss the increase in expected call volumes as it relates to the need for 5 contract staff.
- b) Please advise if the contracts are full-time or part-time and provide the length of the contracts.

VECC Question # 7

Reference: General Staffing

- a) Please advise of the length of the contracts for the 2 clerical staff (Page 28), the Project Management Professional (Page 29), the Wireless Communications Subject Matter Expert (Page 29), and the Project Manager for Data Management and Smart Meter Deployment (Page 39) and whether the work arrangements for these resources are part-time, full-time, permanent or temporary.

VECC Question # 8

Reference: 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 calculate class specific SMDR and SMIRR rate riders for the residential and GS<50 kW rate classes based on full cost causality.
- b) Please provide a table that summarizes the total Smart Meter Rate Adder Revenue collected by customer class.